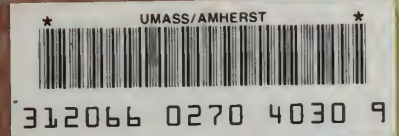


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Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report

EOEA #10458

Logan Airside Improvements Planning Project



Boston
Logan
International
Airport



Massachusetts Port Authority



Federal Aviation Administration

Responses to Comments
Volume 4



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Logan Airside Improvements Planning Project

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March 2001



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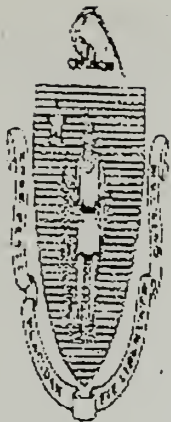
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Acronyms

Airside Project	Logan Airside Improvements Planning Project
CAA	Clean Air Act
dB	decibel
DEP	Massachusetts Department of Environmental Protection
DOT	Department of Transportation
Draft EIS/EIR	Draft Environmental Impact Statement/Environmental Impact Report
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ENF	Environmental Notification Form
EOEA	Executive Office of Environmental Affairs
EPA	Environmental Protection Agency
ESPR	Environmental Status and Progress Report
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
GEIR	Generic Environmental Impact Report
ILS	Instrument Landing Systems
INM	Integrated Noise Model
Logan Airport	Boston-Logan International Airport
Massport	Massachusetts Port Authority
MBTA	Massachusetts Bay Transportation Authority
MEPA	Massachusetts Environmental Policy Act
MESA	Massachusetts Endangered Species Act
MassHighway	Massachusetts Highway Department
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OPSNET	FAA Air Traffic Operations Network
PM ₁₀	particulate matter less than 10 microns in size
PPP	Peak Period Pricing
PRAS	Preferential Runway Advisory System
ROD	Record of Decision
SDEIS Panel	Supplemental Draft EIS Panel
Supplemental DEIS/ FEIR	Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report
VFR	Visual Flight Rules
VOC	volatile organic compounds
29M Low Fleet	29 Million annual air passenger Low Fleet
37.5M High Fleet	37.5 Million annual air passenger High Fleet



The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

100 Cambridge Street, Boston, MA 02202

MARGO PAUL CELLUCCI
GOVERNOR

JANE SWIFT
LEUTENANT GOVERNOR

BOB DURAND
SECRETARY

CERTIFICATE OF THE
SECRETARY OF ENVIRONMENTAL AFFAIRS

Tel (617) 727-9800

Fax (617) 727-2754

<http://www.magnet.state.ma.us/envir>

May 7, 1999

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Logan Airside Improvements Planning Project
PROJECT MUNICIPALITY : Boston/Winthrop
PROJECT WATERSHED : Boston Harbor
EOEA NUMBER : 10458
PROJECT PROPONENT : Massachusetts Port Authority (Massport)
DATE NOTICED IN MONITOR : February 23, 1999

The Secretary of Environmental Affairs hereby determines that the Draft Environmental Impact Report (DEIR) submitted on this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62H) and with its implementing regulations (301 C.M.R. 11.00).

MEPA review is an informal process, which does not itself result in any formal adjudicative decision approving or disapproving a project. Section 11.08(8) of the MEPA Regulations requires me to find a DEIR adequate even if certain aspects of the project require additional description or analysis, so long as the DEIR is generally responsive to the requirements of Section 11.07 and the scope. As described in more detail in this Certificate, after examining the document and the written and oral comments, I have found that the DEIR presents enough information on alternatives, impacts, and mitigation to meet that standard and proceed to the stage of a Final EIR. This determination does not mean that I am satisfied with every aspect of the analysis in the DEIR. The Final EIR must address outstanding issues, including additional mitigation measures, and respond to the substantive comments received.

The Federal Aviation Administration (FAA) is reviewing the project as a Draft Environmental Impact Statement (DEIS) under the National Environmental Policy Act (NEPA). This certificate applies to the review of the project under MEPA only, and does not restrict the ability of the federal government to act on those aspects of the project subject to NEPA.

PROJECT DESCRIPTION

As described in the DEIR, the proponent's preferred alternative includes a 5,000 foot unidirectional runway (Runway 14/32); a 9,300 foot taxiway between Runways 4L/22R and 4R/22L (the Centerfield Taxiway); other taxiway improvements; and reduction of runway approach minima. The DEIR evaluates implementation of Peak Period Pricing, but does not include this measure as part of the preferred alternative. Each of the alternatives was studied for its impacts at different projected future passenger levels: a year 1999 estimate of 29 million, and year 2010 estimates of 37.5 and 45 million. Each level was studied for a "high fleet" with relatively more operations and a "low fleet" with fewer operations.

EXECUTIVE SUMMARY

The proposed project (and especially Runway 14/32) has generated an enormous amount of commentary and controversy, both in the MEPA review of the project and in a much broader political context. This review has brought to a head many long standing concerns about the management of growth at Logan Airport, the environmental and community impacts of that growth, and the mitigation of those impacts.

Within this debate, three principal issues have emerged that will shape the preparation and review of the Final EIR for this project. The first is Logan's role within the regional transportation network. Many commenters have argued that the decision on the DEIR should be deferred until there has been further study of the possible diversion of passenger traffic to other facilities -- notably the regional airports at Providence, Manchester, and Worcester, and Amtrak's new high-speed rail link to New York -- as a solution to problems of congestion and delay at Logan. Some commenters have argued that the only solution to Logan's delay problem is the creation of a new second major airport.

Although I strongly agree on the importance of the regional transportation network, I disagree with the contention that Massport's treatment of this subject in the DEIR has been insufficient. The scope issued by then-Secretary Coxe in 1995 did not require the study of a new second airport, and I am not reopening that issue in the context of this review. The DEIR suggests that the existing airports at Worcester, Manchester, and Providence, seen together, may serve as Boston's "second airport." In the Final EIR, Massport must study the planned improvements at those airports in greater detail, to show the effects upon passenger traffic at Logan. The DEIR already estimates a potential diversion of 7.3 million passengers/year from Logan to regional alternatives by the year 2010, suggesting that future passenger levels at Logan are likely to remain at or below the lower projected level of 37.5 million. If true, this could help allay fears about the impacts of "worst case" projections, and it could support Massport's contention that the runway will have long-term benefits in reducing delays. Potential commitments or mitigations relating to regional transportation include:

- improved ground access to Worcester Airport;
- widening Route 3 to the New Hampshire border, to improve access to Manchester Airport;
- unding construction of a rail station at Providence Airport; and
- implementation of the Urban Ring to improve transit access to Logan.

Delay reductions and environmental benefits at airports can arise out of operational changes, as well as physical improvements. Many commenters have focused on Peak Period Pricing (PPP) as a viable alternative to the runway in reducing delays. The analysis in the DEIR suggests that PPP has independent value in reducing delay, which increases long-term as passenger levels increase. In the

C.1

C.2

FEIR, I am requiring Massport to enhance its PPP study, including a tightly crafted exemption that will protect greatly affected communities from losing connections to the national air network. C.3

- In the FEIR, I am requiring Massport to seek FAA approval for a PPP program as soon as it begins to yield real benefits. C.4

- In the Generic EIR (see below), I am requiring Massport to develop a system of market-based, revenue-neutral landing fees that would reward cleaner planes with lower charges, on the principle that "the polluter pays." C.5

The third major theme that has sounded in this debate is the cumulative impacts of Logan in its entirety. In previous MEPA filings, Massport has made the commitment "to reduce or minimize, wherever practical, the environmental impacts of the operation of Logan Airport as annual passenger volumes rise in the future." The comment letters and the testimony at the public hearings have demonstrated the burden of noise, air pollution, and traffic impacts that neighboring communities will continue to bear as air traffic increases (whether or not Runway 14/32 is built). I believe that the principle of "environmental justice," which so many comments have raised, is largely an expression of this concern.

Massport has argued that the impacts of the airside improvements project are limited because it does not increase the capacity of the airport, or stimulate future demand. I do not fully accept that contention. In the FEIR, I am specifying a series of enforceable short-term and long-term mitigation measures, all intended to make the neighboring communities quieter, cleaner, and less congested. In addition, Massport must address Logan's cumulative impacts in the Generic EIR (GEIR), a separate MEPA document that is fully revised on a five-year cycle, with annual updates. This fall, Massport must submit its latest Annual Update and a proposed scope for the full GEIR revision, to be submitted next summer. I am requiring Massport to treat all comments received on the DEIR as potentially applicable to the GEIR as well. In the FEIR and/or the GEIR, I have required Massport to:

- work with the MBTA to improve transit access to Logan via the Blue Line and the Airport Intermodal Transit Connection (AITC), C.6
- work with the Federal Aviation Administration (FAA) to limit the use of noisier "hush-kitted" aircraft; C.7
- set numerical targets for converting ground service equipment to clean fuels; C.8
- provide more accountability for FAA compliance with the Preferential Runway Advisory System (PRAS) goals, which are intended to distribute aircraft noise more equitably among affected communities; and C.9
- continue to implement and extend its residential soundproofing program, to ensure full access for all residents who are entitled to its benefits. C.10

PURPOSE AND NEED

According to the DEIR, in 1998 Logan ranked 17th in total passengers (26.5 million) and 11th in operations (507,000), but sixth in total delays (143,000 hours). Approximately 47,000 hours of delay were directly attributable to taxiway congestion or northwest wind conditions. Massport has argued that the preferred alternative is intended solely to alleviate those two categories of delays and maximize operational efficiency as passenger levels increase. In other words, the airside projects will accommodate existing and projected demand, not generate additional demand. On the other hand, many commenters clearly see the preferred alternative as an expansion of Logan Airport ("if you build it, they will come" has appeared in numerous letters).

After reviewing the DEIR, I am not convinced that the preferred alternative is purely a capacity neutral airfield enhancement, as stated by Massport. While the maximum "capacity" of the airport will remain at 120 operations per hour with or without the airside improvements, the construction of Runway 14/32 will allow Logan to operate at or near 120 operations per hour for a greater proportion of the year than it currently does. In addition, if delays represent a problem as critical as that presented in the DEIR, there may well be some latent demand generated by the airside project.

I do not, however, believe that developing airport infrastructure automatically creates demand for air service. As noted in previous certificates, the most productive focus of MEPA reviews for Logan projects is not a discussion of whether a project is accommodating or generating demand per se, but rather whether Massport is operating the airport in a manner which minimizes overall environmental impacts in light of its obligations under MEPA.

There are, however, two major issues relating to delays that need further examination. First, the Final EIR should thoroughly explain and justify Massport's delay modeling, as a response to a number of substantive comments. The Final EIR should explain the differences among Massport, the Federal Aviation Administration, and the federal Department of Transportation methods of calculating delays, and discuss any implication for the environmental analysis. Information on delays should be presented in quantitative terms (e.g., average minutes of delay per flight), and compared over time at least since 1993 for Logan and other major U.S. airports. C.11

Secondly, several commenters have questioned Massport's apparent use of 1993, a very delay prone year at Logan, as a base case year. The Final EIR should clarify the base case year used in the delay analysis (and other areas, such as noise and air emissions). If 1993 was indeed the base year, the FEIR should include a "sensitivity analysis" using a more recent year (or average of several recent years) as a baseline, and evaluate the effect on the report's conclusions. C.12

REGIONAL TRANSPORTATION ISSUES

Regional transportation issues have been a focus of many, if not most, of the comment letters. The scope required Massport to study off-site alternatives: specifically, increased use of existing airports and high speed rail. In response, the DEIR includes a detailed discussion of Logan's role in the regional transportation network, which also includes the rapidly growing regional airports in Providence (4.6 million passengers in 1998, up 11%) and Manchester, NH (1.9 million passengers in 1998, up 44%), the currently underused facility at Worcester (only 77,000 passengers in 1998), (footnote 1) and the three-hour high speed rail service to New York slated to begin later this year. It estimates a potential diversion of 7.3 million passengers/year from Logan to regional alternatives (which also include teleconferencing) by the year 2010, based solely on market forces without any additional intervention by Massport or other state transportation agencies. The DEIR diversion analysis suggests that future passenger levels at Logan in the design year 2010 are likely to remain at or below the lower projected level of 37.5 million, rather than attaining the "worst case" 45 million level.

But if the regional airports at Manchester, Worcester, and Providence, taken together, are to play the role of a second major airport for Boston, then Massport and the other state transportation agencies must show that they are doing all they can to ensure the integration of these facilities with Logan as a regional airport system. Massport has recently agreed to operate Worcester Airport, and the Massachusetts Highway Department (MHD) has committed to studying and constructing better roadway access to the airport. EOTC has committed to help fund the construction of a rail station at T.F. Green Airport at Providence, which could provide a fast and convenient link to the new Route 128 Station, currently under construction (EOEA #11099), and to downtown Boston. The planned widening of Route 3 from Route 128 to the New Hampshire border by MHD (EOEA #5668), coupled with the potential for

improved roadway and rail access in New Hampshire, could increase the accessibility and use of Manchester Airport. Finally, the Massachusetts Bay Transportation Authority (MBTA) has planned a series of improvements in transit access to Logan, including the AITC (EOEA #10235), the Blue Line modernization (EOEA #8772), and the Urban Ring.

In response to the high level of public interest and concern over regional transportation issues, the analysis in the FEIR must significantly expand upon that in the DEIR. First, the FEIR must report on the current status of ground access improvements to all four airports proposed by state transportation agencies in Massachusetts or other states (including but not limited to the projects mentioned above), including projected dates for completion of studies and/or construction. Second, the FEIR must quantify the effects of these measures upon projected passenger levels at each of the airports, including Logan. (footnote 2) The projections for ridership on Amtrak's high speed rail, and potential diversions from Logan, should also be updated to reflect the best current information. (footnote 3) C.13 C.14

The DEIR suggests that the 45 million annual passenger level used by Massport in its planning will not occur by the design year 2010. I believe that it is appropriate to continue to study the 45 million passenger scenario, both to assure consistency with previous planning and to analyze a true "worst case" scenario. However, I caution both Massport and reviewers not to focus on the impacts associated with the 45 million passenger scenario, but rather on the impacts of the 37.5 million passenger scenario (assuming that figure is supported by the FEIR analysis). C.15

With renewed focus on diverting passengers from Logan, it is more important than ever that we understand the environmental impacts of increased use of regional airports. DEP has commented that a regional environmental assessment of airport infrastructure would prove useful in determining whether increased use of the regional airports actually minimizes impacts, and the letter from the Conservation Law Foundation lays out a potential framework for a project-specific regional analysis of transportation alternatives in the context of the airside project review. (My predecessor as Secretary also suggested such a regional study in the Certificate on the last GEIR.) The FEIR must try to evaluate the environmental impacts of these improvements on a regional, as well as a local basis. C.16

I acknowledge certain difficulties in presenting the cumulative environmental impacts of physically unrelated projects. Because Manchester and Providence airports are in other states, and because the proposed ground access improvements at Worcester are at such a preliminary stage, I am not requiring Massport to perform independent EIR level review of local impacts at those facilities. Rather, Massport should rely upon existing reports to summarize information on the predicted levels of environmental impacts (such as noise contours, air emissions, vehicle miles traveled, and impacts on wetlands and other critical resources) caused by the physical improvements and predicted passenger levels. I also acknowledge that the inclusion of any project as part of this analysis, regardless of its apparent benefits, will not remove the necessity of independent MEPA review if required by statute and regulation. C.17

Many commenters have urged the study of a new second major airport as an alternative to this project. The scope did not require this analysis, and I am not reopening that issue in the context of the airside project review. Many comments have also suggested that commercial service at Hanscom Field in Bedford should be considered as a project alternative. Massport argues that commercial service at Hanscom is not likely to constitute a feasible alternative to Logan in the foreseeable future, and that Hanscom is better suited to remain the region's principal general aviation (GA) airport. (In 1998, there were approximately 183,000 GA operations at Hanscom, compared with 31,000 at Logan.) To back up Massport's contention, the Final EIR should address in qualitative terms the environmental impacts of commercial service at Hanscom; opportunities to divert an even higher share of Logan's GA operations to Hanscom and other regional airports; and any legal impediments to such measures. Finally, New Bedford Airport has been suggested as a reliever airport for cargo traffic. Massport should report upon the status of MEPA review for the proposed expansion of New Bedford Airport (EOEA #10316), which had previously involved the filling of an unprecedented area (over 40 acres) of protected wetlands. C.18 C.19

The Proposed Section 61 Findings must detail specific steps to be taken by Massport and other state transportation agencies, to ensure that Worcester, Manchester, and Providence airports, together with Logan, will operate jointly as the key elements in an efficient and environmentally balanced regional air network.

C.20

PEAK PERIOD PRICING

Of all the elements under consideration as part of the airside program, the only one not contained in the preferred alternative is Peak Period Pricing (PPP): the imposition of a landing fee surcharge, irrespective of aircraft weight, during the peak hours of 2 PM to 8 PM. This kind of financial disincentive can reduce delays by modifying airline scheduling behavior. The PPP proposal derives indirectly from the PACE program, Massport's 1988 imposition of landing fee incentives to prevent delays, which was ultimately overturned in a court decision as contravening Federal laws protecting interstate commerce. I have received many comments from the airline industry and from groups in small markets (notably the Cape and Islands, and northern New England) voicing strong opposition to Peak Period Pricing, even as most of these letters have supported the other airside projects. Conversely, I have received many comments arguing that PPP alone, without Runway 14/32, should be the preferred alternative for solving the delay problems.

The analysis in the DEIR appears to show that under slower growth scenarios (37.5 million passengers, low fleet), Runway 14/32 yields the greatest delay benefits, with a smaller benefit accruing to PPP. As annual operations increase further (37.5 million, high fleet, and 45 million), implementing PPP leads to greater delay reduction benefits equaling or exceeding those of Runway 14/32. The DEIR analysis also shows that at all levels of growth, the combination of Runway 14/32 and PPP produce the greatest delay benefits. I also note that by reducing taxiway delays, PPP helps reduce air pollution and noise.

I understand the concern of small and relatively remote areas regarding the effects of PPP on access to Logan and points beyond. The DEIR appendices document the negative economic impacts of the proposed PPP program on certain areas. However, I find that the DEIR has not provided enough information to discount PPP as a legitimate (and perhaps even necessary) part of the environmental mitigation associated with any airside improvements.

The Final EIR must include a much more refined analysis of Peak Period Pricing, including a full evaluation of positive and negative (footnote 4) environmental impacts. I am concerned that the DEIR analysis applies only a single price formula to operations, and that it assumes that the response to PPP will be either a cancellation of flights or moving "shoulder" flights out of the time period subject to PPP. The analysis should account for potential alterations in flight mix resulting from PPP (i.e., the possibility of flight consolidation to Logan or diversion to other airports), and it should draw upon past PPP analysis, such as the PACE program and the 1993 Strategic Assessment Report. Most importantly, the Final EIR should re-analyze the delay effects of a PPP program that contains a tightly crafted exemption for greatly affected communities, to ensure that they do not lose access, through Logan or other regional airports, to the national air network.

C.21

In the Final EIR and the Proposed Section 61 Finding, Massport should commit to regular monitoring of peak-period airline schedules and delays, to be reported in the Generic EIR and its Annual Updates. The Final EIR must also define appropriate conditions at which Massport will begin seeking the necessary federal and state regulatory processes, in order to implement a properly structured PPP program.

C.22

C.23

CUMULATIVE IMPACTS AND THE GEIR

I have received numerous comments suggesting that the review of the airside projects has been improperly segmented under MEPA (and NEPA) from the review of airport operations as a whole. The issue of cumulative impacts and segmentation is not new to the review of projects at Logan Airport. As stated in past Certificates, the Generic EIR (EOEA #3247/5146) is expected to provide a "big picture" cumulative analysis of Logan operations, impacts, and mitigation. It complements the project-specific EIR for the airside projects, helps to focus the review process of individual EIRs, and ensures that segmented project review does not occur in the context of MEPA review at Logan Airport.

The 1998 Annual Update to the GEIR will undergo MEPA review later this year. The Annual Update will include a Proposed Scope for the 1999 Logan Airport GEIR. The issues that Massport will address in the 1999 GEIR will overlap to a considerable extent with many of the issues highlighted in this Certificate. As a result, I do not see the need to duplicate the GEIR within the context of the airside EIR review. (I note that the federal review process does not include the formal equivalent of the GEIR, so my comments regarding segmentation are necessarily limited only to the state review process.)

Nonetheless, I emphatically agree that the airside DEIR cannot be viewed in isolation from airport operations and impacts as a whole. The GEIR does not replace the project-specific EIR, nor does it relieve Massport of its obligations under MEPA for project specific analysis of impacts and mitigation. Massport's fundamental environmental commitment, as expressed in the 1994/95 GEIR, is to "reduce or minimize, wherever practical, the environmental impacts of the operation of Logan Airport as annual passenger volumes rise in the future." The requirements laid out in this Certificate will require Massport to address certain cumulative impacts within the context of the project-specific airside Final EIR and in the Section 61 Findings, as detailed below.

ENVIRONMENTAL JUSTICE

Many of the comments received have raised the issue of "environmental justice," as defined under Federal Executive Order 12898 and associated guidance materials. Because in the past the legitimate environmental interests of low income and minority areas too often have "flown under the radar" of the environmental review process, application of the principles of environmental justice is intended to ensure that low income and minority populations are accorded the same standard that applies to those in other areas. Under E.O. 12898, Massport must fully analyze the environmental impacts of its proposed actions on low income and minority populations; show that it has avoided, minimized, or mitigated these impacts to the greatest feasible extent; and ensure that its proposed actions do not unduly burden low income or minority areas. To assess whether Massport has adequately analyzed the issue for purposes of MEPA review, the Final EIR should include more detailed demographic data on the affected populations in both tabular and graphic form, analysis of the full range of impacts (including noise impacts within the 60 dB contour), a comparison of the affected population with that of Boston and the other affected municipalities, and a discussion of the community participation process used in preparing the Draft and Final EIRs.

C.24

Many of the comments have used the term "environmental justice" more broadly. Rather than focusing on the legal definition of disproportionate impacts to low income or minority populations, such comments question whether neighborhoods in Boston and adjacent communities should bear the brunt of impacts from the region's air travel when many of the people using Logan live outside of Route 128. The comment letters and the testimony at the public hearings have demonstrated the burden of cumulative noise, air pollution, and traffic impacts that neighboring communities will continue to bear as air traffic increases (whether or not Runway 14/32 is built). This broader principle of fairness, and a concern with the cumulative impacts of airport operations, has informed my decisions throughout this Certificate. Therefore, in addition to requiring the further analysis that will satisfy the Executive Order, I have focused on concrete mitigation measures in the FEIR and the GEIR that will maintain or reduce the existing envelope of cumulative environmental impacts from airport operations.

NOISE

No other single issue so dominates the comment letters as the issue of aircraft noise, which has united a diverse cross section of the metropolitan area. The impassioned oral testimony at the public hearings drove home the point that aircraft noise profoundly affects the lives of the people who live underneath flight paths. Article 49 of the Massachusetts Constitution enshrines a right to freedom from "excessive and unnecessary noise." The time has come to address the issue of airport noise clearly and definitively. I am convinced that simply soundproofing the most affected residences and completing the phase-in of quieter Stage 3 aircraft, which is required under Federal law by the end of 1999, cannot be the final answers to the issue of noise mitigation. C.25

The DEIR includes a detailed assessment of the noise impacts of the proposed Runway 14/32 and the other airside projects. The net result of Massport's preferred alternative is to reduce dramatically the number of people modeled to be exposed to the highest (>70 dB DNL) levels of noise. At the same time, the project is projected to produce a relatively small increase in the number of people exposed to noise in the 65-70 dB DNL range, and a somewhat larger increase in the 60-65 dB DNL range. Although not expressly quantified in the DEIR, the implementation of the preferred alternative also redistributes the exposed population. It appears that up to 40% of the people within the 65-70 dB contour will be newly included, while an equal number of people will fall into lower contours. A similar pattern exists for the 60-65 dB contour. The Final EIR should quantify the number of "new" people within each noise contour under the preferred alternative. It should also present information on the 60-65 dB noise contour within the text, and not just in the appendices. C.26

Previous certificates on the GEIR have dwelled at length about the issues of noise impacts and mitigation. At the core of the noise abatement policy stands the commitment in the 1994/95 GEIR to "minimizing nighttime noise and to addressing and responding to noise issues and complaints." Given the extremely high level of concern expressed with noise impacts from Logan in general and from Massport's preferred alternative in particular, it is time to turn these general policy goals into specific noise mitigation commitments. C.27

Soundproofing.

Many comments have pointed out the limitations of residential acoustical treatment (the "soundproofing" program), which only works indoors with closed windows. While I recognize these limitations, the program is and will continue to be an important part of Massport's noise mitigation commitments. The Final EIR and the Proposed Section 61 Finding should contain feasible implementation measures to ensure full access to the soundproofing program for all residents who are entitled to its benefits. C.28

Massport uses the federal criteria of residing within a 65 dB DNL contour for determining soundproofing eligibility. As EPA points out, the modeled noise contours do not exactly match the measured field values, and they appear to somewhat underestimate Day-Night Levels (DNL) of sound. Moreover, as anyone who has ever lived under a flight path can attest, noise from aircraft overflights can create significant environmental impacts even for those who reside outside the 65 dB contour. From the data in the technical appendix, it is clear that thousands of residents are and will be exposed to noise just below 65 dB DNL as a result of airport operations. (A primary purpose of requiring information on the 60 dB noise contour was to document which areas might fall within a zone defined by an appropriate "margin of error" for noise modeling.) Given the number of people who are potentially ineligible for soundproofing because of modeling limitations, in the Final EIR Massport should examine further refinements to its contours that would ensure full access to soundproofing for all affected residents. Also in the Final EIR, Massport must commit to providing soundproofing for all residents currently within the C.29

65 dB contour, even if they would otherwise lose their eligibility as a result of this project.

C.30

The soundproofing program requires that structures within the 65 dB DNL contour meet certain code requirements prior to receiving acoustical treatments. I am concerned that the residences most in need of soundproofing will be in low income areas with relatively high proportions of sub-standard housing. The Final EIR should explain how often such circumstances have occurred in the past. If some (presumably low income) residents are likely to be denied noise mitigation on this grounds, the FEIR and the Proposed Section 61 Finding should consider financial or other programs to ensure equal access to noise mitigation.

Compliance with PRAS Goals

C.31

The Preferential Runway Advisory System (PRAS) goals, initially developed in the 1970s, is a set of voluntary targets for FAA runway assignments, aimed at ensuring a more equitable regional distribution of aircraft noise among all affected communities. The DEIR demonstrates that the implementation of the preferred alternative will significantly improve compliance with PRAS goals. From the discussion it is not clear, however, if compliance with the PRAS goals represent maximum feasible mitigation under MEPA. I note that the PRAS program predates MEPA review of Logan Airport, and the modern focus on environmental justice issues. I am also concerned that changes in land use patterns and residential densities may have altered the validity of the assumptions under which the PRAS program was developed. Although I am not convinced that a wholesale revamping of the PRAS program is appropriate (nor has the CAC suggested that step), the Final EIR should discuss whether any updates of the PRAS goals are contemplated, and detail any mechanisms for ensuring that the program fulfills its objective of creating an equitable noise distribution.

C.32

Several commenters have questioned the level of FAA's adherence to PRAS goals in the past. Massport must show in the FEIR that its prediction of the future effects of the PRAS goals do not over-estimate FAA's ability and willingness to implement them, as based on past experience. In addition, the FEIR and the Proposed Section 61 Finding must include protocols for monitoring adherence to the PRAS goals, and periodic disclosure of the monitoring results (I suggest quarterly reports to the CAC, plus annual statements in the GEIR update).

C.33

Upon implementation of the preferred alternative, Runway 27 is projected to see an increase in use, potentially leading to further increases in aircraft overflights over portions of Roxbury, Jamaica Plain, and Brookline. From the comments received, it appears that the compliance with the new flight procedures has been incomplete. It also appears that the new Runway 27 corridor tends to narrow the geographical area of overflights, thus concentrating noise in certain areas. The Final EIR should discuss the relationship between the airside program and the recently-completed Runway 27 EIS, (footnote 5) describe any cumulative impacts on the corridor, and analyze the consistency of the noise impacts with the PRAS goals.

C.34

Restricting Night-time Flights and Hush-kitted Aircraft.

In the near term, the phasing out of stage 2 aircraft by the end of 1999 will produce a decline in the total annual noise produced by Logan aircraft. In the longer term, however, both total annual noise and night-time noise are projected to increase as the number of flights in an all Stage 3 fleet rises. Moreover, many of the aircraft currently operating at Logan are actually stage 2 aircraft that have received mechanical alterations ("hush-kits") to meet the minimum requirements for stage 3 aircraft. These planes are significantly noisier than new aircraft specifically designed to meet stage 3 requirements.

C.35

As an initial step, I note that the PRAS goals seek to route all night-time flights over the water between 12 PM and 6 AM. In the FEIR, Massport should report on the feasibility of extending this preferential night-time period to the hours of 10 PM to 7 AM, and the effect of this change on noise levels and contours.

C.36

Federal law allows the Federal Aviation Administration (FAA) to grant a waiver (under FAR Part 161) to an airport operator to restrict the number or schedule of Stage 3 aircraft. Massport should begin discussions now with FAA, with the goal of instituting restrictions, either locally or nationally, on hush-kitted stage 3 aircraft. The GEIR should report on the status of those consultations and discuss the specific types of information needed to pursue a Part 161 waiver. Since developing limitations on Stage 3 operations will necessarily involve the federal government, I urge the members of the Congressional delegation to help pursue this issue further with FAA.

AIR QUALITY

The DEIR argues that the preferred alternative will lead to air quality improvements by increasing the operating efficiency of the airport, thereby better accommodating existing demand. (footnote 6) As stated above, I am not convinced that Massport's preferred alternative is capacity neutral, although I disagree with those commenters who have suggested that the addition of a sixth runway will be the primary factor in drawing additional air traffic to Logan Airport.

Even accepting Massport's arguments about the air quality benefits of its preferred alternative, the airside project raises issues of cumulative air quality that Massport must address. Logan Airport currently ranks as the sixth largest source of NO_x emissions in the Commonwealth, and by 2010 it is likely to become one of the three largest such sources. Currently, aircraft emissions are the only mobile air pollution sources included in the State Implementation Plan (SIP) emissions inventory that are not slated for meaningful near- or long-term emissions reductions. Nationally, pollution emissions from aircraft and airports represent the largest uncontrolled sources of air pollution. NO_x is an ozone precursor. Although Eastern Massachusetts has fared well in meeting one-hour standards for ozone over the past few years, recently there were 65 exceedences of the more stringent 8-hour standard adopted by the federal Environmental Protection Agency (EPA), over 12 days, at 14 different monitoring stations. It is quite likely that additional emissions reduction beyond those already in the SIP will prove necessary for Massachusetts to meet the 8-hour standard.

As previous certificates have stressed, it is the total air pollution from the airport -- whether from planes, the ground fleet servicing these aircraft, or the vehicles carrying passengers and employees -- which requires mitigation. Previous GEIRs have done a thorough job of documenting emissions from Logan Airport and in predicting trends based on various passenger level forecasts. Now it is time to implement the broad goal of maintaining or reducing Logan's overall environmental impacts, even as annual passenger volumes rise in the future.

C.37

To make this commitment more effective, in the GEIR Massport must examine the feasibility of a system of market-based, revenue-neutral landing fees that reward cleaner planes with lower charges, on the principle that "the polluter pays." Airports in Europe, notably Zurich, are beginning to institute programs of this kind. In the GEIR, I am directing Massport to develop and model a system of emissions-based landing fees. If it is effective, practicable, and consistent with Federal law, then Massport will begin the necessary regulatory process for implementing the program by a date certain, to be defined in the GEIR scope. As an initial step toward reducing emissions, Massport should set numerical annual targets in the GEIR for the conversion of its tenants' ground service equipment to clean fuels, and for providing electric power to aircraft at all gates.

C.38

GROUND TRANSPORTATION

Numerous comments argue that the DEIR should have included a detailed analysis of ground transportation issues, because of the cumulative impacts of landside and airside operations at Logan Airport. The issue of ground transportation is clearly relevant to any discussion of cumulative impacts, and is an important component of any cumulative air quality analysis. However, the GEIR includes a substantial body of analysis on ground transportation issues, and the Section 61 Finding for the West Garage project includes enforceable commitments for ground transportation mitigation. Because Massport is dealing with this issue in other documents, I will not require a detailed analysis of Massport's ground transportation strategy within the Final EIR, but rather focus on the following issues.

One of the cornerstones of Massport's ground access strategy is a commitment to a 35.2% mode share for High Occupancy Vehicles (HOV) when passenger volumes reach 37.5 million annually. As previous certificates have pointed out on numerous occasions, although this goal translates into an increase in HOV mode shares from the present, it also represents a substantial increase in the absolute number of non-HOV trips to the airport, due to the large increase in total number of passengers. Massport has not shown how these non-HOV trips will be accommodated under the parking freeze. C.39

Massport should consider a higher target percentage for HOV at 37.5 million annual passengers, and discuss the issue in the GEIR. Massport should also consider enforcement mechanisms for whatever HOV percentage emerges (for example, committing to set aside a sliding scale of funding for HOV/transit promotion and improvements if HOV goals do not reach the levels to which Massport has committed). In the GEIR, Massport should also consider the consolidation of rental car lots and the courtesy vehicles serving them. I understand that this form of air quality mitigation is in practice at other airports in the United States. C.40

Finally, the Final EIR and the analysis in the next GEIR should reflect proposed MBTA improvements in transit access to Logan, including the AITC, the Blue Line modernization, and the Urban Ring. In particular, the Urban Ring project, shortly scheduled to conclude its major investment study and begin MEPA review, promises not only to improve transit access to Logan, but also to enhance mobility, economic development, and the quality of life in many of the communities most affected by the airport -- East Boston, South Boston, Roxbury, Cambridge, Somerville, Everett, and Chelsea. C.41

UNIDIRECTIONALITY OF RUNWAY 14/32 C.42

The DEIR analyzes only the environmental impacts of a unidirectional Runway 14/32, with both take offs and landings following an easterly flight path largely over water. Any proposal to use the runway in a bidirectional manner would need additional MEPA review, including the scoping, preparation, and review of an entirely new EIR document. Ever since the Airside Improvements project was first proposed, Massport has publicly committed to keeping Runway 14/32 as a unidirectional runway. The Proposed Section 61 Findings in the Final EIR should include this enforceable commitment to unidirectionality. The Final EIR should also document any other legal or administrative processes, or any operational or environmental constraints, that can assure unidirectionality. In particular, Massport should detail how the modified court injunction can assure unidirectional use of Runway 14/32, how any FAA regulations may affect use of the runway, and whether any physical constraints (e.g., the Hyatt Hotel) would preclude or restrict the possible bidirectional use of Runway 14/32. C.43

CONSTRUCTION PERIOD C.44

The Final EIR should include a detailed construction management plan that quantifies the number of daily and total truck trips. The Final EIR should also address the cumulative impacts of those C.45

C.46

construction activities for the airside projects occurring simultaneously with Central Artery/Tunnel construction in East Boston, other projects at Logan Airport, and any other major construction activities planned to occur in East Boston. The Final EIR should also disclose the full impacts of any nighttime construction, and include an analysis of nighttime construction noise in residential areas potentially affected.

C.47

The Final EIR and the GEIR should also discuss the feasibility of Massport's participation in the Clean Air Construction Initiative, both with respect to this project and other construction projects at the airport. This program involves retrofitting existing heavy construction equipment with emissions control technology. (The Central Artery/Tunnel project is already participating in this program, and the Department of Environmental Protection is actively discussing an expansion of the program with several other public agencies.) The Proposed Section 61 Findings should include appropriate commitments for construction period mitigation, in particular for the traffic, air quality, and noise impacts discussed above.

C.48

Massport's preferred alternative involves a substantial amount of soil excavation. The Department of Environmental Protection has raised several issues regarding excavate classification and management, to which the Final EIR should respond in detail.

C.49

OPEN SPACE/PARKLAND

The Boston area is fortunate to have large areas of open space, such as the Emerald Necklace, Arnold Arboretum, Franklin Park, and the Harbor Islands, that provide a refuge from busy urban life. Noise from passing aircraft can clearly impact the quality of these open spaces, and reduce their value for recreation or quiet contemplation. Although the legislation that created the Harbor Islands National Recreation Area relieved Massport and the FAA of Federal section 4(f) requirements for this project, it did not exempt impacts on the Harbor Islands from environmental review under MEPA. The Final EIR should analyze the environmental impacts of the airside projects (including cumulative impacts with other airport operations) on the Harbor Islands, Arnold Arboretum, Franklin Park, and the Emerald Necklace. I understand the desire to direct flight corridors over the least densely populated areas, and recognize that in the final analysis, such policies may be justifiable. However, that analysis must take place, to fully evaluate impacts and develop maximum feasible mitigation.

C.50

RARE SPECIES

Massport's preferred alternative will impact the nesting and feeding habitat of the state endangered Upland Sandpiper (*Bartramia longicauda*) and will constitute the "taking" of a state-protected species under the Massachusetts Endangered Species Act. The DEIR commits to both on-site and off-site mitigation for rare species impacts. The discussion of on-site mitigation in the DEIR is generally adequate. However, the Final EIR should provide greater detail on the proposed off-site mitigation, including the specifics of the habitat restoration proposed at the Massachusetts Military Reservation. The Final EIR should also include sufficient information for the Natural Heritage Program to evaluate the merits of a Conservation Permit. The Proposed Section 61 Finding should include all on-site and off-site mitigation for impacts to rare species.

C.51

NOTICE OF PROJECT CHANGE

At the time the DEIR was filed, Massport also filed a Notice of Project Change, based upon the three-year lapse in time since the filing of the ENF, and it requested a determination that no further review was required for the change. I deferred a decision on this request until the conclusion of the DEIR review period. Several commenters have argued that a Supplemental DEIR should be required based solely upon the lapse of time. I find, however, after considering the documents and the comments in light of the factors set forth in Section 11.10(6) of the MEPA Regulations, that any issues arising out

of the lapse of time can be adequately addressed in the FEIR or the GEIR, as the case may be.

C.52

SECTION 61 FINDINGS

The Final EIR should include Proposed Section 61 Findings for each area of impact associated with Massport's preferred alternative. I remind Massport of the importance of the Section 61 Findings as a mechanism for formalizing the mitigation commitments that emerge from the EIR process, and I expect that the Section 61 Findings will commit to appropriate mitigation.

COMMENTS

The Final EIR should include a copy of this Certificate and copies of all comments received, and it should respond to all substantive comments received. In particular, I wish to highlight the comments received from the United States Environmental Protection Agency, the Massachusetts Department of Environmental Protection, the Community Advisory Committee to Massport (and individual CAC members), the Conservation Law Foundation, the various New England state transportation agencies, the City of Boston Environmental Services Division, the La Salle Partnership, and the letters received from elected public officials. Together, these comment letters summarize most of the major substantive environmental issues raised by opponents, proponents, and neutral reviewers.

C.53

CIRCULATION

For those who submitted form letters for which addresses are available, Massport should send a Notice of Availability of the Final EIR and include information on comment deadlines and the time-sensitive nature of the review process. For those who submitted individual comment letters, Massport should circulate an Executive Summary of the Final EIR. The Executive Summary should include a cover letter with information on comment deadlines (including the time-sensitive nature of the documents under review), and information on where to obtain a full copy of the Final EIR. Massport should circulate the full Final EIR to its standard distribution list of agencies and community groups, as well as any additional parties specified in Section 11.16 of the MEPA regulations. Massport should Circulate a full copy of the Final EIR to the municipal libraries (including branch libraries) of Boston, Winthrop, Everett, Revere, Nahant, Malden, Medford, Melrose, Somerville, Cambridge, Chelsea, Brookline, Dedham, Milton, Quincy, Braintree, Weymouth, Hingham, Hull, Provincetown, Edgartown, and Nantucket. Massport should promptly furnish a full copy of the EIR to any party who requests a copy.

C.54

FOOTNOTES

- **Footnote 1.** The DEIR reports passenger emplanements in Table 2 4-1. These are only 50% of total passengers.
- **Footnote 2.** I suggest that the estimated impacts of teleconferencing should be discounted in this analysis, unless Massport can make a compelling case why this would affect Logan differently from other regional airports.
- **Footnote 3.** I also note the importance of maintaining South Station as the gateway to Amtrak's high speed rail link to New York, while the City of Boston pursues air rights development over the tracks. The EIR currently being prepared for that project (EOEA #9131) must contain a detailed construction mitigation program to ensure the smooth functioning of the station.
- **Footnote 4.** I note the potential for increased reliance on early morning and late evening flights as one potentially negative impact from PPP.
- **Footnote 5.** The review of the Runway 27 flight path was conducted at the federal level only.
- **Footnote 6.** The comment from the Environmental Protection Agency (among others) has raised several concerns with the assumptions used in the air quality analysis. The Final EIR should address these fully, to justify the conclusion that Massport's preferred alternative is associated with the lowest level of air quality impacts.

Dated: May 7, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs

Comments received :

2/26/99 David Bartol
3/2/99 David Prusky
3/3/99 Ann Hershfang
3/5/99 Mary Dreitlein
3/11/99 Joseph Kowalczyk
3/12/99 Charlie Ferguson
3/15/99 Eagle Hill Civic Association
3/15/99 Regina Marchi
3/18/99 Christopher Blackler
3/18/99 Myra Love
3/18/99 Martha Merson
3/18/99 Charles and Anna Dulcetta
3/19/99 Ellen Winkler
3/19/99 Barbara Bishop
3/22/99 Monika Corneille
3/22/99 Elizabeth Mazzarini
3/25/99 Brian Gallagher
3/26/99 Mark and Cathryn Stettler
3/29/99 William Falcetano (2)
3/29/99 Danielle Toth
3/29/99 Sal Lopes
3/29/99 Natalie Diffloth
3/30/99 Richard Lynds Esq.
3/30/99 Daniel and Jacqueline Llewellyn
3/31/99 Vincent Tino
3/31/99 Sean Shanahan
3/31/99 Corrine Case
4/2/99 Marjorie Rilleau Kallman
4/2/99 Aircraft Owners and Pilots Association
4/2/99 Greater Gardner Chamber of Commerce
4/2/99 Geraldine Townsend
4/2/99 William Townsend
4/2/99 David Banta and Caroline Coggeshall
4/4/99 Swissoiei
4/6/99 Manchester Airport Director
4/6/99 Mary Quinn
4/6/99 Marriott Copley Place
4/6/99 Nantucket Island Chamber of Commerce
4/7/99 Richard Jordan
4/7/99 Laura Orlando
4/7/99 Community Advisory Committee to Massport
4/7/99 Frank and Eileen Furey
4/7/99 Krolman Corporation
4/7/99 William Falcetano
4/7/99 Quincy Representative to the Community Advisory Committee to Massport
4/7/99 Cape Air
4/7/99 Logan Airlines Management Council Cargo Subcommittee

4/7/99 Logan Airlines Management Council
4/7/99 Massachusetts Business Roundtable
4/7/99 Thomas Kershaw
4/7/99 City of Quincy City Council
4/7/99 Maryann Mahony
4/7/99 Squantum Community Association
4/7/99 Paul Guzzi
4/7/99 Ron Wayland
4/7/99 City of Boston Mayor Thomas Menino
4/7/99 PRI Automation
4/7/99 Representative Robert DeLeo
4/7/99 Senator Henri Rauschenbach
4/7/99 transcripts of oral testimony at 4/7 FAA/MEPA meeting
4/7/99 video of 4/7 FAA/MEPA meeting
4/8/99 transcripts of oral testimony at 4/8 FAA/MEPA meeting
4/8/99 video of 4/8 FAA/MEPA meeting
4/8/99 Mary Quinn
4/8/99 Nantucket Board of Selectmen
4/8/99 Marriott Long Wharf
4/8/99 William Manning
4/8/99 Nancy Crombie
4/8/99 Eleanora Olivolo
4/8/99 Winthrop Noise Air Pollution and Airport Hazards Committee
4/8/99 Jim McBride
4/8/99 City of Chelsea City Councillor Preston Galarneau
4/8/99 U.S. Representative Edward Markey
4/8/99 Ron Wayland
4/8/99 British Airways
4/8/99 Mary Furlong
4/8/99 Robert Hazel
4/8/99 Scott Godfrey, Air Transport Association
4/8/99 Mike Furlong
4/8/99 Craig and Linda Jolliffe
4/9/99 anonymous
4/9/99 Fitcorp
4/9/99 Richard Gill
4/9/99 Gregory DePatto
4/12/99 anonymous
4/12/99 New England Guatemalan Alliance
4/12/99 Krolman Presentations
4/12/99 National Association of Industrial and Office Properties
4/12/99 Tufts Associates
4/12/99 Marriott Peabody
4/12/99 Representative Eric Turkington
4/12/99 Eagle Hill Civic Association
4/13/99 Patricia Grasso
4/13/99 Mary Dreitlein
4/13/99 Nancy Brayton
4/13/99 Diana Goode
4/13/99 Anne Rogers
4/13/99 Charles Cann
4/13/99 Judith and John Silck
4/13/99 British Airways
4/13/99 City of Cambridge City Council
4/13/99 Emily Peckham
4/14/99 Daniel Toner
4/14/99 Paul Puzzanghero

4/14/99 Gil and Bonnie Lavoie
4/14/99 Lynn Mazzarulla
4/14/99 Vincent Ferne
4/14/99 Sherburne, Powers, Holland, & Knight
4/14/99 Greater Boston Convention & Visitors Bureau
4/14/99 City of Revere Planning and Community Development Department
4/14/99 David Foss
4/14/99 Madeleine Carlson
4/14/99 Olympia Mastrocola
4/14/99 John and Barbara Tomenico
4/14/99 Carmen Domenico
4/14/99 Town of Winthrop Noise Air Pollution and Airport Hazards Committee
4/15/99 U.S. Representative Edward Markey
4/15/99 Barbara Kaplan
4/15/99 John Archibald
4/16/99 National Association of State Aviation Officials
4/16/99 Sandra Kunz (Braintree Representative to CAC)
4/16/99 James Sliker
4/16/99 Lynn Thornton
4/16/99 Gerard Finch
4/16/99 Christine Toole
4/16/99 Will Lyman
4/16/99 Marty Epp
4/16/99 Daniel Barnett
4/16/99 Thomas Finnigan
4/16/99 Danielle Toth
4/16/99 Jacqueline Gambarini
4/16/99 Mike Lew
4/16/99 Peter Clarke
4/16/99 Sal Lopes
4/16/99 Todd Payton
4/16/99 Senator Michael Morrissey
4/16/99 Jacques Weissgerber
4/16/99 EMC Corporation
4/16/99 Andrea Taaffe
4/16/99 Suzan Kelly
4/16/99 Marie and James Stamos
4/16/99 Alan Wright
4/16/99 Slade Gorton & Co, Inc.
4/19/99 Jack Dolan
4/19/99 Derek Dyer
4/19/99 Nancy Doherty
4/20/99 M. Grazia Marzot
4/20/99 Michael Mercadante
4/20/99 Mo Lotman
4/20/99 Barbara White
4/20/99 Cape Cod Commission
4/20/99 William Weiser
4/20/99 Irving Fischman PhD
4/20/99 Hispanic-American Chamber of Commerce
4/20/99 Pauline DePari
4/20/99 Carolyn and Brent Banulis
4/20/99 Alice Granahan
4/20/99 Michael County
4/20/99 Adrienne Richardson
4/20/99 James McCaffery
4/20/99 James Conroy

4/20/99 Catherine Goldhammer
4/20/99 Dr. and Mrs. Robert Belknap
4/20/99 John Richardson
4/20/99 Edward Lowney
4/20/99 Cape Cod Economic Development Council
4/20/99 Carmela D'Amore
4/20/99 City of Revere City Council
4/20/99 Robert Green
4/20/99 JD Russell
4/20/99 David Weinstein (2)
4/20/99 Mark Warren
4/20/99 Pilot Block Neighborhood Association
4/20/99 Angela Healy
4/20/99 Marty Epp and Judy Mencher
4/20/99 Representative Patricia Jehlen
4/20/99 William Reid
4/20/99 Elliott Schiffman
4/20/99 Sterling Giles
4/20/99 Marine Cotton
4/20/99 Arthur Johnson
4/20/99 Robert Wynne
4/20/99 John Kilroy
4/20/99 John Archibald
4/20/99 Cape Cod Chamber of Commerce
4/20/99 Don Eunson
4/20/99 Susan Horn
4/20/99 Michael County
4/20/99 Lynn Palmer
4/20/99 Lawrence Paoella
4/20/99 Continental Airlines
4/20/99 Ellen Band
4/20/99 Jill Richard
4/20/99 Robert Fleming
4/20/99 Lawrence Yager
4/20/99 Beverly Sky
4/20/99 Barbara Kaplan
4/20/99 AIR, Inc (McGowan et al)
4/21/99 City of Cambridge City Manager
4/21/99 Michele LaMura
4/21/99 Elaine McGrath
4/21/99 Natural Heritage and Endangered Species Program
4/21/99 State of Maine Department of Transportation
4/21/99 Anastasia Lyman
4/21/99 Claudia Brede (2)
4/21/99 Kurt Walter (Cambridge Representative to CAC)
4/21/99 Town of Hingham Board of Selectmen
4/21/99 Al Fisher
4/21/99 Tilghman Evans
4/21/99 LaSalle Hotel Operating Partnership (by Goulston & Storrs)
4/21/99 Sandra Gibbs
4/21/99 Catherine Brayden
4/21/99 Panamai Manadee
4/21/99 Debra Biba and Rob Everts
4/21/99 Deirdre Smith
4/21/99 Beth Manaster
4/21/99 Sheryl White
4/21/99 Carol Rego

4/21/99 Anthony Espy
4/21/99 Mrs. Regina Marchi
4/21/99 Barbara McDonough
4/21/99 Allison Stieber
4/21/99 Martha Gjestebj
4/21/99 Dovi Abbey (Roxbury Representative to CAC)
4/21/99 M. Blossom Hoag
4/21/99 Ethan Hoag
4/21/99 Mr. and Mrs. Joseph Nucci
4/21/99 Nantucket Planning and Economic Development Commission
4/21/99 Cheryl Balukonis
4/21/99 Mary Berninger
4/21/99 Peter Alachi
4/21/99 Noise Pollution Clearinghouse
4/21/99 Richard Salini
4/21/99 anonymous
4/22/99 S. Kay Gibbs
4/22/99 William Manning
4/22/99 Town of Provincetown Town Manager
4/22/99 Cape Air
4/22/99 Dorchester Allied Neighborhood Associations
4/22/99 City of Chelsea City Councilor Marilyn Portnoy
4/22/99 Senate President Thomas Birmingham
4/22/99 Representative Timothy Toomey
4/22/99 City of Somerville Board of Alderman
4/22/99 Chester Atkins for Save Our Heritage
4/22/99 City of Boston City Councillor Paul Scapicchio
4/22/99 Friends of Belle Isle Marsh
4/22/99 Representative Christopher Fallon
4/22/99 Representative Liz Malia
4/22/99 Representative Paul Demakis
4/22/99 Acting Mayor of Somerville William Roche
4/22/99 Massachusetts Audubon Society
4/22/99 Michael Dukakis, former Governor
4/22/99 Fred Salvucci
4/22/99 United States Environmental Protection Agency
4/22/99 Senator Robert Travaglini
4/22/99 City of Somerville Alderman William White
4/22/99 State of Vermont Agency of Transportation
4/22/99 The Franklin Park Coalition
4/22/99 Constance Cecil
4/22/99 Robert and Kathleen Hathaway
4/22/99 City of Malden Representative to the Community Advisory Committee to Massport
4/22/99 Margaret Sanfilippo
4/22/99 Ellis Neighborhood Association, Inc.
4/22/99 Susan Strauss
4/22/99 Town of Winthrop Noise Air Pollution and Airport Hazards Committee Environmental
Health Facts Subcommittee
4/22/99 Marguerite Scott
4/22/99 Brian Culver
4/22/99 Thomas McNiff
4/22/99 Jerry Shine
4/22/99 Margaret Webster
4/22/99 Jane Sauer
4/22/99 Barbara Kaplan
4/22/99 Stephen Muench, Executive Director MAC
4/22/99 Darryl Pomictier

4/22/99 American Airlines
4/22/99 Ramon Bueno and Debra Weisberg
4/22/99 Dick Bauer
4/22/99 Lauri Webster
4/22/99 Tad Flynn
4/22/99 Ann Hershfang
4/22/99 Provincetown Municipal Airport Commission
4/22/99 Beacon Hill Civic Association, Inc.
4/22/99 John Mahony
4/22/99 Catherine Goldhammer
4/22/99 Claudia Brede
4/22/99 Peter Alachi
4/22/99 Kimberly Iris Mills
4/22/99 Elizabeth Aberg
4/22/99 Anita Martin
4/22/99 Barnstable Municipal Airport Commission
4/22/99 Stephen Thress
4/22/99 Dr. Jo Loughnane
4/22/99 Deborah Santiano-McHatton
4/22/99 Edwina Yeziarski
4/22/99 Brian Merrick
4/22/99 Alicia Stoddard
4/22/99 Duane Andrews RN
4/22/99 Ron Morgese
4/22/99 Robert Ridolfi
4/22/99 Mary Jane Quinn (with photos)
4/22/99 Richard Goldhammer (Hingham Representative to CAC)
4/22/99 Lynn Conroy
4/22/99 Jeannette MacDonald
4/22/99 Robert Carney
4/22/99 The New England Council
4/22/99 Robert Billings
4/22/99 Doris Hogan
4/22/99 T. Brown
4/22/99 anonymous
4/22/99 Jacques Weissgerber
4/22/99 Franklyn and Barbara Schafer
4/22/99 Nina Garfinkle
4/22/99 Christopher Morton
4/22/99 Stephanie Moura and Kate Keeler
4/22/99 The South Boston Environmental Health Watch
4/22/99 East Boston Land Use Advisory Council
4/22/99 Gerard Sperry
4/22/99 John O'Connor
4/22/99 Robert and Katherine Strojny
4/22/99 Lisa Scannell
4/22/99 Jeffries Point Neighborhood Association (with petition signed by 304 people opposed to project and 19 form letters opposed to project)
4/22/99 E. Vincent Sullivan
4/22/99 Mark Ingaciola
4/22/99 Bradford and Jane Tripp
4/22/99 Harold and Lorraine Lincoln
4/22/99 Charles and Susan Berry
4/22/99 Alice Granahan
4/22/99 Provincetown AIDS Support
4/22/99 Carla Wilbur
4/22/99 Mary Jane Quinn (with video from Mary Jane Quinn and Elaine McGrath)

4/23/99 Representative Byron Rushing
4/23/99 Beachmont Neighborhood Association, Inc.
4/23/99 Town of Hull Board of Selectmen (by Town Manager)
4/23/99 Building and Construction Trades Council of the Metropolitan District
4/23/99 Jean Riesman
4/23/99 The Seaport Alliance for a Neighborhood Design
4/23/99 Karen Rucker
4/23/99 Jeffries Point Neighborhood Association (with petition signed by 17 people opposed to project)
4/23/99 Barbara Bishop
4/23/99 Boston Harbor Islands Advisory Council
4/23/99 International Union of Operating Engineers
4/23/99 Anthony Petrucci
4/23/99 City of Chelsea City Manager Guy Santagate
4/23/99 Town of Winthrop Board of Selectmen
4/23/99 Mary Ellen Welch
4/23/99 U.S. Representative John Joseph Moakley
4/23/99 U.S. Department of the Interior
4/23/99 Carol Kiley
4/23/99 Roberta Horn
4/23/99 Bernice Mader
4/23/99 City of Chelsea City Councillor Rochelle Bennett
4/23/99 Jack Christin, Jr.
4/23/99 Amanda Sawires
4/23/99 Jon Burk
4/23/99 Albert Engelhart
4/23/99 Mary Moynihan
4/23/99 John McKennan
4/23/99 Alice Mahoney
4/23/99 Alliance of Boston Neighborhoods
4/23/99 Ronald Fama
4/23/99 Iron Workers District Council of New England
4/23/99 Provincetown Business Guild (with petition with 87 signatures in support of project)
4/23/99 Masspirg
4/23/99 Irv Englander
4/23/99 Senator Stephen Lynch
4/23/99 Charlestown Business Association
4/23/99 MJ Research, Inc.
4/23/99 Chelsea Waterfront Association
4/23/99 N.E.E.D. Logan
4/23/99 Representative Eugene O'Flaherty
4/23/99 Representative Kevin Fitzgerald
4/23/99 Joseph Guilino (Meirose Representative to the CAC)
4/23/99 GreenWorks (John O'Connor)
4/23/99 Conservation Law Foundation
4/23/99 Bear Stearns Co.
4/23/99 Greater Boston Chamber of Commerce
4/23/99 Mona Thaler
4/23/99 AIR, Inc. (by McGowan et al)
4/23/99 Massachusetts Sierra Club
4/23/99 Matthew Baronas
4/23/99 100 Captain's Row Condominium Trust
4/23/99 Admiral's Way Condominium Trust
4/23/99 Leeward Heights Condominium Trust
4/23/99 100 Commandant's Way Condominium Trust
4/23/99 Clipper Condominium Trust
4/23/99 Breakwater Condominium Trust

4/23/99 City of Boston Mayor Thomas Menino
 4/23/99 City of Boston Environmental Services
 4/23/99 Metropolitan Area Planning Council
 4/23/99 Neighborhood Association of the Back Bay, Inc.
 4/23/99 Edith De Angelis
 4/23/99 Massachusetts Department of Environmental Protection
 4/26/99 Fidelity Investments
 4/26/99 City of Boston City Councillor Charles Yancey
 4/26/99 Lory Newmeyer and Steve Cooper
 4/26/99 Stephen Lathrop
 4/26/99 Lauri Webster
 4/26/99 Teamsters Union Local 379
 4/26/99 Edward D'Alelio
 4/26/99 Town of Hull Planning Board
 4/26/99 International Union of Operating Engineers Local 4
 4/26/99 Robert De Mayo
 4/26/99 Back Bay Photo Imaging
 4/26/99 Mark and Cathryn Stettler
 4/26/99 Sarah Buermann
 4/26/99 Ivan and Nancy Blecher
 4/26/99 Barry Corden
 4/26/99 Provincetown Municipal Airport Commission
 4/26/99 Representative Joseph Sullivan
 4/26/99 Winthrop Chamber of Commerce
 4/26/99 Charlestown Business Association
 4/26/99 Francis McHugh
 4/26/99 Air Transport Association
 4/26/99 Sharon Fisher
 4/27/99 City of Somerville Board of Alderman (with video)
 4/27/99 Charlie Ferguson
 4/27/99 Melissa Sciter
 4/27/99 Fuld and Company
 4/28/99 Heather Hughes
 4/28/99 Charlie Ferguson
 4/28/99 McCarthy, Allegretto & McCarthy
 4/28/99 Construction and General Laborers' Union Local 22
 4/28/99 Arthur Hartnett
 4/28/99 Frances Keyes
 4/29/99 National Association of Railroad Passengers
 4/30/99 Cape Cod Legislative Delegation
 4/30/99 Edwina Yezierski
 4/30/99 Alex Geourntas (Roslindale/Hyde Park Representative to the CAC)
 4/30/99 Louis DiSano
 various dates 697 form letters in opposition to the project
 various dates 57 phone calls in opposition to the project and 1 phone call in support

BAD/ASP/asp

Certificate of the Secretary of Environmental Affairs on the Logan Airside Improvements Planning Project Draft EIR

Code	Topic 1	Topic 2	Comment	Response
C.1	Regional Transportation	Regional Airports	Although I strongly agree on the importance of the regional transportation network, I disagree with the contention that Massport's treatment of this subject in the DEIR has been insufficient. The scope issued by then-Secretary Coxé in 1995 did not require the study of a new second airport, and I am not reopening that issue in the context of this review.	Comment noted.
C.2	Regional Transportation	Regional Airports	<p>The DEIR suggests that the existing airports at Worcester, Manchester, and Providence, seen together, may serve as Boston's "second airport." In the Final EIR, Massport must study the planned improvements at those airports in greater detail, to show the effects upon passenger traffic at Logan... Potential commitments or mitigation relating to regional transportation include:</p> <ul style="list-style-type: none"> ■ improved ground access to Worcester Airport; ■ widening Route 3 to the New Hampshire border, to improve access to Manchester Airport; ■ funding construction of a rail station at Providence Airport; and ■ implementation of the Urban Ring to improve transit access to Logan. 	An expanded and updated discussion of the regional alternatives is presented in Chapter 2 of the Supplemental DEIS/FEIR. Massport supports all the planned improvement projects that will enhance the attractiveness of the regional airports as alternatives to Logan Airport. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a description of the upcoming New England Airports System Study.
C.3	Alternatives	Peak Period Pricing	...I am requiring Massport to enhance its PPP study, including a tightly crafted exemption that will protect greatly affected communities from losing connections to the national air network.	Refer to Section 4.5 of the Supplemental DEIS/FEIR for an expanded discussion of PPP. An exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5.3 of the Supplemental DEIS/FEIR. The section provides an illustrative exemption program and its impact on the delay reduction potential of PPP.
C.4	Alternatives	Peak Period Pricing	I am requiring Massport to seek FAA approval for a PPP program as soon as it begins to yield real benefits.	Massport will take all steps necessary to implement PPP with an appropriate exemption program when such a program is appropriate. No formal FAA approval of PPP is required. Also, refer to response to Comment C.21.
C.5	Air Quality	Emission-Based Landing Fees	In the Generic EIR (see below), I am requiring Massport to develop a system of market-based, revenue-neutral landing fees that would reward cleaner planes with lower charges on the principle that "the polluter pays."	The EOE May 7, 1999 Certificate on the Airside Project Draft EIS/EIR requested that Massport undertake a feasibility study of implementing measures to reduce Nox emissions at Logan. This study is currently underway and will be presented to MEPA by the end of March 2001.
C.6	Ground Transportation	Access To Logan	In the FEIR and/or the GEIR, I have required Massport to work with the MBTA to improve transit access to Logan via the Blue Line and the Airport Intermodal Transit Connection (AITC);	Massport is working with the MBTA to improve transit access to Logan Airport via the Blue Line and the Airport Intermodal Transit Connector (AITC). Section 2.7 of the Supplemental DEIS/FEIR discusses the proposed MBTA improvements in transit access to Logan Airport. The <i>Logan Airport 1999 ESPR</i> (previously GEIR), reports on the status of these ground transit improvement projects.

Code	Topic 1	Topic 2	Comment	Response
C.7	Noise	Hushkitted Aircraft	In the FEIR and/or the GEIR, I have required Massport to work with the Federal Aviation Administration (FAA) to limit the use of noisier "hush-kitted" aircraft;	Massport's initial efforts have been to focus discussion with Logan Airport carriers to encourage substitution of full Stage 3 certified aircraft for hushkitted aircraft where feasible. Both the Supplemental DEIS/FEIR and the <i>Logan Airport 1999 ESPR</i> (previously GEIR) discuss the status of and potential for reducing the use of hushkitted Stage 3 aircraft. Refer to Section 8.4 of the Supplemental DEIS/FEIR.
C.8	Air Quality	Alternative Fuels	In the FEIR and/or the GEIR, I have required Massport to set numerical targets for converting ground service equipment to clean fuels;	The <i>Logan Airport 1999 ESPR</i> (previously GEIR) reports on Massport's Alternative Fuels Vehicle program and on Massport's efforts to encourage the use of alternative fuel vehicles.
C.9	Noise	PRAS	In the FEIR and/or the GEIR, I have required Massport to provide more accountability for FAA compliance with the Preferential Runway Advisory System (PRAS) goals, which are intended to distribute aircraft noise more equitably among affected communities.	Massport has developed PRAS goals to which the FAA attempts to achieve given weather and safety conditions. Section 4.3 of the Supplemental DEIS/FEIR provides an evaluation of existing measures for monitoring PRAS achievement and demonstrates that the FAA has improved its performance relative to the PRAS goals. The Preferred Alternative mitigation program includes additional reporting requirements recommended to enhance the Massport monitoring effort.
C.10	Noise	Soundproofing	In the FEIR and/or the GEIR, I have required Massport to continue to implement and extend its residential soundproofing program, to ensure full access for all residents who are entitled to its benefits.	Section 8.5 of the Supplemental DEIS/FEIR describes the sound insulation proposed for the affected residences that fall within the 65 dB DNL contour for the Preferred Alternative as defined by the 29M Low Fleet scenario. Massport reported on progress on its existing sound insulation program in the <i>Logan Airport 1999 ESPR</i> (previously GEIR). In addition sound insulation will be provided for affected residences impacted by the Preferred Alternative as discussed in Section 6.8 of the Supplemental DEIS/FEIR.
C.11	Delay	Model	...[T]he Final EIR should thoroughly explain and justify Massport's delay modeling, as a response to a number of substantive comments. The Final EIR should explain the differences among Massport, the Federal Aviation Administration, and the Federal Department of Transportation methods of calculating delays, and discuss any implication for the environmental analysis. Information on delays should be presented in quantitative terms (e.g., average minutes of delay per flight), and compared over time at least since 1993 for Logan and other major U.S. airports.	Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports.
C.12	Delay	Model	...The Final EIR should clarify the base case year used in the delay analysis (and other areas, such as noise and air emissions). If 1993 was indeed the base year, the FEIR should include a "sensitivity analysis" using a more recent year (or average of several recent years) as a baseline, and evaluate the effect on the report's conclusions.	Using 1993 had the benefit of representing a worst case scenario for both noise impacts and delays due to over-scheduling. The Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. The No Action Alternative is the appropriate "base" comparison for assessing future year conditions and the effectiveness of the Airside Project. The Supplemental DEIS/FEIR expands upon the discussion between current and historical conditions and can be found in Section 4.2 of the Supplemental DEIS/FEIR.
C.13	Regional Transportation	Regional Airports	...[T]he FEIR must report on the current status of ground access improvements to all four airports proposed by state transportation agencies in Massachusetts or other states ... including projected dates for completion of studies and/or construction.	Chapter 2 of the Supplemental DEIS/FEIR discusses the impact of planned ground access improvement projects at Logan Airport and the regional airports on passenger traffic levels and high-speed rail passenger diversion estimates.

Code	Topic 1	Topic 2	Comment	Response
C.14	Regional Transportation	Regional Airports	...[T]he FEIR must quantify the effects of these measures upon projected passenger levels at each of the airports, including Logan. The projections for ridership on Amtrak's high-speed rail, and potential diversions from Logan, should also be updated to reflect the best current information.	Section 2.8 of the Supplemental DEIS/FEIR discusses passenger and activity growth at the regional airports and their effect on Logan Airport's projected passenger and activity levels. With regard to ridership projections on Amtrak's high-speed rail, the Airside Project Draft EIS/EIR described in detail the best current information. No updated projections are available. Refer to Appendix B of the Supplemental DEIS/FEIR for Amtrak's letter stating that no revised ridership estimates are available.
C.15	Regional Transportation	Regional Airports	...I caution both Massport and reviewers not to focus on the impacts associated with the 45 million passenger scenario, but rather on the impacts of the 37.5 million passenger scenario	Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR.
C.16	Regional Transportation	Regional Airports	...[I]t is more important than ever that we understand the environmental impacts of increased use of regional airports...The FEIR must try to evaluate the environmental impacts of these improvements on a regional, as well as a local basis...Because Manchester and Providence airports are in other states, and because the proposed ground access improvements at Worcester are at such a preliminary stage, I am not requiring Massport to perform independent EIR level review of local impacts at those facilities. Rather, Massport should rely upon existing reports to summarize information on the predicted levels of environmental impacts (such as noise contours, air emissions, vehicle miles traveled, and impacts on wetlands and other critical resources) caused by the physical improvements and predicted passenger levels...	Appendix B of the Supplemental DEIS/FEIR describes available environmental documents for the regional airports (T.F. Green/Providence, Manchester, Worcester Regional and Hanscom Field airports) and summarizes predicted levels of environmental impacts of proposed improvement projects and forecast activity levels.
C.17	Regional Transportation	Regional Airports	Many commenters have urged the study of a new second major airport as an alternative to this project. The scope did not require this analysis, and I am not reopening that issue in the context of the airside project review.	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
C.18	Regional Transportation	Regional Airports	Many comments have also suggested that commercial service at Hanscom Field in Bedford should be considered as a project alternative. Massport argues that commercial service at Hanscom is not likely to constitute a feasible alternative to Logan in the foreseeable future...[T]o back up Massport's contention, the Final EIR should address in qualitative terms the environmental impacts of commercial service at Hanscom; opportunities to divert an even higher share of Logan's GA operations to Hanscom and other regional airports and any legal impediments to such measures.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.
C.19	Regional Transportation	Regional Airports	New Bedford Airport has been suggested as a reliever airport for cargo traffic. Massport should report upon the status of MEPA review for the proposed expansion of New Bedford Airport (EOEA #10316), which had previously involved the filling of an unprecedented area (over 40 acres) of protected wetlands.	Massport reports on the status of the New Bedford Airport Project in Section 2.6 of the Supplemental DEIS/FEIR.
C.20	Regional Transportation	Regional Airports	The Proposed Section 61 Findings must detail specific steps to be taken by Massport and other state transportation agencies, to ensure that Worcester, Manchester, and Providence airports, together with Logan, will operate jointly as the key elements in an efficient and environmentally balanced regional air network.	Refer to Chapter 2 of the Supplemental DEIS/FEIR. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.21	Alternatives	Peak Period Pricing	I find that the DEIR has not provided enough information to discount PPP as a legitimate (and perhaps even necessary) part of the environmental mitigation associated with any airside improvements. The Final EIR must include a much more refined analysis of Peak Period Pricing, including a full evaluation of positive and negative environmental impacts... The analysis should account for potential alterations in flight mix resulting from PPP (i.e., the possibility of flight consolidation to Logan or diversion to other airports), and it should draw upon past PPP analysis, such as the PACE program and the 1993 Strategic Assessment Report. Most importantly, the Final EIR should re-analyze the delay effects of a PPP program that contains a tightly crafted exemption for greatly affected communities, to ensure that they do not lose access, through Logan or other regional airports, to the national air network.	Section 4.5 of the Supplemental DEIS/FEIR provides an updated discussion of PPP at Logan Airport and an analysis of the implications of an illustrative conceptual small community exemption program. PPP was included among the Airside Project alternatives to address delays caused by over-scheduling. In the current environment, airline over-scheduling is not a significant contributor to Logan Airport delays and, therefore, PPP was not recommended for immediate implementation. In addition, PPP imposes significant costs on regional airlines and is expected to restrict access to certain markets. The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption program.

Code	Topic 1	Topic 2	Comment	Response
C.22	Alternatives	Peak Period Pricing	In the Final EIR and the Proposed Section 61 Findings, Massport should commit to regular monitoring of peak-period airline schedules and delays, to be reported in the Generic EIR and its Annual Updates.	Refer to Section 4.5.4 of the Supplemental DEIS/FEIR for a discussion of the proposed PPP Monitoring Program, which is designed to identify the conditions when airline overscheduling will become a significant contributor of delay. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.23	Alternatives	Peak Period Pricing	The Final EIR must also define appropriate conditions at which Massport will begin seeking the necessary federal and state regulatory processes, in order to implement a properly structured PPP program.	Refer to Section 4.5.4 of the Supplemental DEIS/FEIR.
C.24	Environmental Review Process	Public Process	...the Final EIR should include more detailed demographic data on the affected populations in both tabular and graphic form, analysis of the full range of impacts (including noise impacts within the 60 dB contour), a comparison of the affected population with that of Boston and the other affected municipalities, and a discussion of the community participation process used in preparing the Draft and Final EIRs.	<p>More detailed graphics showing affected population and land uses are set out in Chapters 5 and 6 of the Supplemental DEIS/FEIR. Also, data on noise-affected population have been added or made clearer in tables in the Supplemental DEIS/FEIR.</p> <p>There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings.</p> <p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p>

Code	Topic 1	Topic 2	Comment	Response
C.25	Noise	Mitigation	I am convinced that simply soundproofing the most affected residences and completing the phase-in of quieter Stage 3 aircraft, which is required under Federal law by the end of 1999, cannot be the final answers to the issue of noise mitigation.	Massport's Noise Rules and FAA-approved sound insulation program have been only two elements of its overall noise abatement program. An expanded discussion of Massport's Noise Abatement Program is included in Chapter 8 of the Supplemental DEIS/FEIR. Massport is currently supporting FAA's effort to improve conformance to the new Runway 27 flight corridor and explored means of extending its sound insulation program through innovative investigation of hill effects on sound propagation as discussed in the <i>Logan Airport 1999 ESPR</i> . Massport is also actively involved in encouraging growth at Worcester Regional Airport and other alternative airports, and is committed to monitoring and improving the PRAS.
C.26	Noise	Impacts	... The Final EIR should quantify the number of "new" people within each noise contour under the preferred alternative. It should also present information on the 60-65 dB noise contour within the text, and not just in the appendices.	Refer to Tables 5.2-3 and 6.2-3 through 6.2-5 of the Supplemental DEIS/FEIR for population data down to DNL values of 60 dB. Also, refer to newly included and newly excluded populations attributable to the Preferred Alternative in Tables 6.2-6 through 6.2-7 of the Supplemental DEIS/FEIR.
C.27	Noise	Nighttime Noise	At the core of the noise abatement policy stands the commitment in the 1994/95 GEIR to "minimizing nighttime noise and to addressing and responding to noise issues and complaints." ... it is time to turn these general policy goals into specific noise mitigation commitments.	Refer to response to Comment C.7. Massport is committed to a comprehensive noise abatement program, including addressing nighttime noise, as set out in response to Comment C.25.
C.28	Noise	Soundproofing	The Final EIR and the Proposed Section 61 Finding should contain feasible implementation measures to ensure full access to the soundproofing program for all residents who are entitled to its benefits.	Massport is committed to ensuring access to sound insulation for all eligible dwelling units. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.29	Noise	Mitigation	Given the number of people who are potentially ineligible for soundproofing because of modeling limitations, in the Final EIR Massport should examine further refinements to its contours that would ensure full access to soundproofing for all affected residents. Also in the Final EIR, Massport must commit to providing soundproofing for all residents currently within the 65 dB contour, even if they would otherwise lose their eligibility as a result of this project.	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the <i>Logan Airport 1999 ESPR</i> (previously GEIR)). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the <i>Logan Airport 1999 ESPR</i> . For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.

Code	Topic 1	Topic 2	Comment	Response
C.30	Noise	Soundproofing	I am concerned that the residences most in need of soundproofing will be in low income areas with relatively high proportions of sub-standard housing. The Final EIR should explain how often such circumstances have occurred in the past. If some (presumably low income) residents are likely to be denied noise mitigation on this grounds, the FEIR and the Proposed Section 61 Finding should consider financial or other programs to ensure equal access to noise mitigation.	Federal requirements typically exclude the FAA from any responsibility to bring a building up to code when the structure is sub-standard but otherwise qualifies to participate in an airport sponsored sound insulation program. However, to address impacts in particular projects such as the proposed Airside Project, FAA has discretion to use grant funds to bring buildings up to code as part of the mitigation program to the extent such improvements are required to proceed with the sound insulation work. The mitigation program for the Airside Project includes use of grant funds for such purposes. For the eligible residences, the FAA will fund building code improvements, to the extent necessary, to implement effective sound insulation treatment. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.31	Noise	PRAS	...the Final EIR should discuss whether any updates of the PRAS goals are contemplated, and detail any mechanisms for ensuring that the program fulfills its objective of creating an equitable noise distribution.	Section 4.3 of the Supplemental DEIS/FEIR demonstrates that there have been no significant demographic changes to warrant an update of the PRAS goals. The Preferred Alternative mitigation program includes additional reporting requirements recommended to enhance the PRAS monitoring effort. Section 6.2 of the Supplemental DEIS/FEIR addresses the reductions in numbers of most highly exposed people that benefit from improved PRAS achievement under the Preferred Alternative. These reductions are consistent with the PRAS goals.
C.32	Noise	PRAS	Massport must show in the FEIR that its prediction of the future effects of the PRAS goals do not over-estimate FAA's ability and willingness to implement them, as based on past experience.	Section 4.3 of the Supplemental DEIS/FEIR demonstrates that the FAA has improved its performance in achieving the PRAS goals since the enhanced PRAS was installed. The Preferred Alternative mitigation program includes several new elements for an expanded PRAS monitoring and reporting system to encourage FAA controllers. The unidirectional Runway 14/32 would enable FAA controllers to significantly improve achievement of PRAS goals.
C.33	Noise	PRAS	...the FEIR and the Proposed Section 61 Finding must include protocols for monitoring adherence to the PRAS goals, and periodic disclosure of the monitoring results...	Refer to Section 4.3.5 on PRAS monitoring and Section 8.5 of the Supplemental DEIS/FEIR regarding Massport's continued commitment to improve PRAS monitoring and periodic disclosure. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.34	Noise	PRAS	The Final EIR should discuss the relationship between the airside program and the recently completed Runway 27 EIS, describe any cumulative impacts on the corridor, and analyze the consistency of the noise impacts with the PRAS goals.	Section 5.2.3 of the Supplemental DEIS/FEIR addresses differences in flight tracks between the Supplemental DEIS/FEIR, the Runway 27 EIS, and the <i>Logan Airport 1997 and 1998 Annual Updates</i> . Updates of the noise contours from operations on all runways, including for Runway 27, is discussed in Section 6.2 of the Supplemental DEIS/FEIR.
C.35	Noise	Nighttime Noise	...the PRAS goals seek to route all nighttime flights over the water between 12PM and 6AM. In the FEIR, Massport should report on the feasibility of extending this preferential nighttime period to the hours of 10 PM to 7 AM, and the effect of this change on noise levels and contours.	Section 4.3.6 of the Supplemental DEIS/FEIR provides an analysis of extending the preferential nighttime period from 10 PM to 7 AM.

Code	Topic 1	Topic 2	Comment	Response
C.36	Noise	Hushkitted Aircraft	Massport should begin discussions now with FAA, with the goal of instituting restrictions, either locally or nationally, on hushkitted Stage 3 aircraft.	Massport commits to continue discussions with airlines with the goal of reducing use of hushkitted Stage 3 aircraft at Logan Airport.
C.37	Air Quality	Emissions-Based Landing Fees	Now is the time to implement the broad goal of maintaining or reducing Logan's overall environmental impacts, even as annual passenger volumes rise in the future. To make this commitment more effective, in the GEIR Massport must examine the feasibility of a system of market-based, revenue-neutral landing fees that reward cleaner planes with lower charges, on the principle that "the polluter pays." ... In the GEIR, I am directing Massport to develop and model a system of emissions-based landing fees.	Refer to response to Comment C.5.
C.38	Air Quality	Alternative Fuels	As an initial step toward reducing emissions, Massport should set numerical annual targets in the GEIR for the conversion of its tenants' ground service equipment to clean fuels, and for providing electric power to aircraft at all gates.	As specified in the <i>Logan Airport 1999 ESPR</i> , Massport will use the results of its alternative fuel survey to evaluate the feasibility of setting alternative fuel targets for tenant ground service equipment and vehicles.
C.39	Ground Transportation	Access To Logan	One of the cornerstones of Massport's ground access strategy is a commitment to a 35.2% mode share for High Occupancy Vehicles (HOV) when passenger volumes reach 37.5 million annually. ... [A]lthough this goal translates into an increase in HOV mode shares from the present, it also represents a substantial increase in the absolute number of non-HOV trips to the airport, due to the large increase in total number of passengers. Massport has not shown how these non-HOV trips will be accommodated under the parking freeze. Massport should consider a higher target percentage for HOV at 37.5 million annual passengers, and discuss the issue in the GEIR.	The <i>Logan Airport 1999 ESPR</i> (formerly the GEIR) which was filed on December 15, 2000, examines the feasibility of a higher target percentage for air passenger HOV ridership than 35.2 percent and discusses parking demand and management.
C.40	Ground Transportation	Access To Logan	Massport should also consider enforcement mechanisms for whatever HOV percentage emerges...	Refer to response to Comment C.39.
C.41	Ground Transportation	Mitigation	In the GEIR, Massport should also consider the consolidation of rental car lots and the courtesy vehicles serving them.	The <i>Logan Airport 1999 ESPR</i> (previously GEIR), which was filed on December 15, 2000, discusses the benefits of consolidating rental car lots and the courtesy vehicles serving them.
C.42	Ground Transportation	Access To Logan	...[T]he Final EIR and the analysis in the next GEIR should reflect proposed MBTA improvements in transit access to Logan, including the ATTC, the Blue Line modernization, and the Urban Ring.	Refer to response to Comment C.6.
C.43	Alternatives	Runway 14/32	Any proposal to use Runway 14/32 in a bidirectional manner would need additional MEPA review, including the scoping, preparation, and review of an entirely new EIR document.	Massport agrees with this comment. The projected unidirectional use of Runway 14/32 is based upon operational, efficiency and safety concerns, as well as environmental considerations. Moreover, the environmental analyses developed for the Supplemental DEIS/FEIR are based upon the proposed runway being used in a unidirectional manner (<i>i.e.</i> , it will be available only for arrivals and departures conducted over Boston Harbor). The unidirectional limitation is inherent to the Runway 14/32 concept that is the subject of the Federal and state environmental review processes.
C.44	Environmental Review Process	MEPA	The Proposed Section 61 Findings in the Final EIR should include this enforceable commitment to unidirectionality. The Final EIR should also document any other legal or administrative processes, or any operational or environmental constraints that can assure unidirectionality.	Draft Section 61 Findings are in Section 8.7 of the Supplemental DEIS/FEIR. Refer to the discussion of unidirectionality in Section 8.5 of the Supplemental DEIS/FEIR.
C.45	Construction	Mitigation	The Final EIR should include a detailed construction management plan that quantifies the number of daily and total truck trips.	A discussion of the construction phasing, truck trips, and mitigation measures to be employed during construction of the Preferred Alternative is presented in Section 6.9 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
C.46	Construction	Impacts	The Final EIR should also address the cumulative impacts of those construction activities for the airside projects occurring simultaneously with Central Artery/Tunnel construction in East Boston, other projects at Logan Airport, and any other major construction activities planned to occur in East Boston.	The cumulative construction impacts associated with the airside projects occurring simultaneously with the Central Artery/Tunnel (CA/T) construction and other projects at Logan Airport and in East Boston are not anticipated to be significant because of project coordination and mitigation programs that will reduce construction period impacts. The peak cumulative construction traffic would occur in 2003, mostly as a result of concurrent CA/T construction on the airport. Truck traffic associated with construction decreases significantly after 2003 as CA/T construction on the airport is completed. Refer to Section 7.5 of the Supplemental DEIS/FEIR for a discussion of cumulative construction impacts.
C.47	Construction	Impacts	The Final EIR should also disclose the full impacts of any nighttime construction, and include an analysis of nighttime construction noise in residential areas potentially affected.	Section 6.9 of the Supplemental DEIS/FEIR includes an analysis of nighttime construction noise in potentially affected residential areas. There is no significant impact.
C.48	Construction	Air Quality	The Final EIR and the GEIR should also discuss the feasibility of Massport's participation in the Clean Air Construction Initiative, both with respect to this project and other construction projects at the airport. The Proposed Section 61 Findings should include appropriate commitments for construction period mitigation, in particular for the traffic, air quality, and noise impacts discussed above.	As stated in Section 6.9 of the Supplemental DEIS/FEIR, Massport is committed to implementing the Clean Air Construction Initiative in cooperation with MADEP and Northeast States for Coordinated Air Use Management (NESCAUM). Furthermore, construction will conform to FAA AC 150/5370-10A, <i>Standards for Specifying Construction of Airports</i> . See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.
C.49	Soil/Sediment	Reuse/Disposal	Massport's preferred alternative involves a substantial amount of soil excavation. The Department of Environmental Protection has raised several issues regarding excavate classification and management, to which the Final EIR should respond in detail.	The Airside Project Draft EIS/EIR presented language to provide context for Governors Island soil classification that was initially conducted before the current Massachusetts Contingency Plan (MCP) was implemented. The volume of excavate has been reduced as a result of the on-going removal of stockpiled Central Artery/Tunnel soil material from Governors Island, and the findings of a subsurface investigation program show that much of the existing soil material on the airport is suitable for construction and therefore does not have to be removed. The Supplemental DEIS/FEIR has been revised to incorporate DEP comments and to minimize confusion between the two classification terminologies.
C.50	Noise	Open Space/ Parkland	The Final EIR should analyze the environmental impacts of the airside projects (including cumulative impacts with other airport operations) on the Harbor Islands, Arnold Arboretum, Franklin Park, and the Emerald Necklace.	The Supplemental DEIS/FEIR contains additional analysis of the project relative to parklands. As depicted in Figure 6.3-4 of the Supplemental DEIS/FEIR, the Arnold Arboretum, Emerald Necklace, and Franklin Park are well outside the 65 dB DNL noise contour associated with the Preferred Alternative. Therefore, the Airside Project will have no impact on these parklands. In addition, the Boston Harbor Islands, while within the No Action Alternative 65 dB DNL noise contour, will have no noise increase under the Preferred Alternative. Refer to Section 6.3 of the Supplemental DEIS/FEIR for additional discussion of parklands. See also 49 U.S.C. Section 47101 (h) (2) which provides that Logan Airport operations are not deemed to constitute use of the Boston Harbor Islands.

Code	Topic 1	Topic 2	Comment	Response
C.51	Ecosystem	Rare Species	The discussion of on-site mitigation [for rare species impacts] in the DEIR is generally adequate. The Final EIR should provide greater detail on the proposed off-site mitigation, including the specifics of the habitat restoration proposed at the Massachusetts Military Reservation. The Final EIR should also include sufficient information for the Natural Heritage Program to evaluate the merits of a Conservation Permit. The Proposed Section 61 Finding should include all on-site and off-site mitigation for impacts to rare species.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.
C.52	Environmental Review Process	MEPA	The Final EIR should include Proposed Section 61 Findings for each area of impact associated with Massport's preferred alternative. I remind Massport of the importance of the Section 61 Findings as a mechanism for formalizing the mitigation commitments that emerge from the EIR process, and I expect that the Section 61 Findings will commit to appropriate mitigation.	Draft Section 61 Findings are in Section 8.7 of the Supplemental DEIS/FEIR.
C.53	Environmental Review Process	MEPA	The Final EIR should include a copy of this Certificate and copies of all comments received, and it should respond to all substantive comments received.	The Final EIR includes a copy of the MEPA Certificate and copies of all comments received. The Final EIR also includes responses to all substantive comments.
C.54	Environmental Review Process	FAA/NEPA	For those who submitted form letters for which addresses are available, Massport should send a Notice of Availability of the Final EIR and include information on comment deadlines and the time-sensitive nature of the review process. For those who submitted individual comment letters, Massport should circulate an Executive Summary of the Final EIR. ... Massport should circulate the full Final EIR to its standard distribution list of agencies and community groups, as well as to any additional parties specified in Section 11.16 of the MEPA regulations....[Massport should] furnish a full copy of the EIR to any party who requests a copy.	<p>A Notice of Availability of the Supplemental DEIS/FEIR has been sent to those who submitted form letters for which addresses are available. The Notice includes information on comment deadlines.</p> <p>An Executive Summary of the Supplemental DEIS/FEIR has been circulated to those who submitted individual comment letters.</p> <p>A Supplemental DEIS/FEIR has been sent to Massport's standard distribution list of agencies and community groups as well as to additional parties specified in Section 11.16 of the MEPA regulations. A Supplemental DEIS/FEIR will be furnished to any party who requests a copy.</p>

MICHAEL E. CAPUANO
8TH DISTRICT, MASSACHUSETTS

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Congress of the United States
House of Representatives
Washington, DC 20515-2108

May 13, 1999

WASHINGTON OFFICE
1232 LONGWORTH BUILDING
WASHINGTON, DC 20515-2108
(202) 225-6111
FAX: (202) 225-8922

DISTRICT OFFICE
110 FIRST STREET
CAMBRIDGE, MA 02141
(617) 821-8208
FAX: (617) 821-8922
www.house.gov/capuano

LETTER 1

Ms. Jane Garvey
Administrator
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

Dear Administrator Garvey,

I write to express my deep and continuing concern regarding the Massachusetts Port Authority's proposal to construct Runway 14/32 at Logan International Airport and to urge that you advise against further action to develop the runway.

Logan has reached capacity. Though the airport may technically have the physical capability to accommodate further increases in traffic, the human and social costs are prohibitively high. Moreover, expansion of the airport is at this time, absent a more thorough and comprehensive plan and firm timetable to implement such plan, an insufficient response to Logan's traffic problems. With or without construction of a new runway, estimates of the increase in Logan's air traffic over the next ten years alone are as high as seventy percent - and some projections indicate more than double today's air traffic by the middle of the next century.

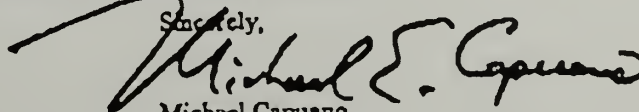
For more than twenty years, state officials, in cooperation with other agencies, community groups, and businesses, have advocated a regional approach. Unfortunately, no clear mission has been developed and little action has been taken to address the problem in a thoughtful and forward-looking way. Today, the state is making great progress toward improving the terminals and other land-side facilities at Logan, but it has promoted Runway 14/32 as its *only* proposal to improve the region's air traffic configuration. A more comprehensive, regional approach has gone unaddressed.

A full consideration of alternatives is needed before a piecemeal response is approved. Some proposals not yet thoroughly considered include immediate implementation of incentive "peak-pricing," diversion of small aircraft to alternate airports, and more effective use of underutilized regional airports such as Hanscom Airfield (only a few minutes drive from Boston's downtown), the Municipal Airport in Worcester, Massachusetts, Weymouth Airport in Weymouth, Massachusetts, T. P. Green Airport in Providence, Rhode Island, Manchester Airport in Manchester, New Hampshire, and Pease Airport in Portsmouth, New Hampshire.

I urge the FAA to demand full consideration of a comprehensive plan for air traffic in Eastern Massachusetts *before* proceeding with patchwork projects that only provide short-term solutions for a long-term problem. Before any major action is taken, a comprehensive plan and a definitive schedule for implementation must be in place, and adequate funding must be secured.

Thank you for your attention to this matter of great importance to our regional economy, and to the health and welfare of the people of Eastern Massachusetts.

Sincerely,



Michael Capuano
Member of Congress

1.1

1.2

1.3

1.4

Letter 1

US Congressman Michael Capuano

Code	Topic 1	Topic 2	Comment	Response
1.1	Purpose and Need	Economic Costs	Though the airport may technically have the physical capability to accommodate further increases in traffic, the human and social costs are prohibitively high.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates.
1.2	Regional Transportation	Regional Airports	For more than twenty years, state officials, in cooperation with other agencies, community groups, and businesses, have advocated a regional approach. Unfortunately, no clear mission has been developed and little action has been taken to address the problem in a thoughtful and forward-looking way. A more comprehensive, regional approach has gone unaddressed.	<p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>
1.3	Alternatives	Peak Period Pricing	Some proposals not yet thoroughly considered include immediate implementation of incentive "peak-pricing"	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an updated discussion of PPP at Logan Airport and an analysis of the implications of an illustrative conceptual small community exemption program.</p> <p>The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the <i>1993 Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
1.4	Regional Transportation	Regional Airports	Some proposals not yet thoroughly considered include diversion of small aircraft to alternate airports, and more effective use of underutilized regional airports such as Hanscom Airfield, the Municipal Airport in Worcester, Weymouth Airport, T.F. Green Airport, Manchester Airport, and Pease Airport.	<p>Although prioritizing takeoffs based on aircraft size might reduce delays, the air traffic control system of the United States, which the FAA operates, is based on a first-come, first-serve policy under most circumstances. Any change in this policy would require a major federal decision and would involve a massive overhaul of the entire air traffic control system, including procedures, manuals, software, controller/pilot training, etc. Changing the policy for a single airport would be nearly impossible for administrative reasons and would create serious safety issues with non-standard procedures.</p> <p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>

Congress of the United States
House of Representatives
Washington, DC 20515-2107

4100 RAYBURN BUILDING
WASHINGTON, DC 20515-2107
(202) 225-2836

DISTRICT OFFICES:

5 HIGH STREET, SUITE 101
MEDFORD, MA 02155
(781) 396-2900

188 CONCORD STREET, SUITE 102
FRAMINGHAM, MA 01702
(508) 875-2900

April 7, 1999

LETTER 2

John P. DeVillars, Regional Administrator
United States Environmental Protection Agency
Region One
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Dear Mr. DeVillars:

I am writing to express my opposition to the proposed expansion of Logan International Airport, including the planned construction of Runway 14/32. The construction of this new runway would expand Logan's capacity for operations and increase its current potential for future growth. But there are several reasons why the Environmental Protection Agency should advise the Federal Aviation Administration against the implementation of Runway 14/32. These include the resulting increase in noise pollution and other adverse environmental impacts, Runway 14/32's ineffectiveness in alleviating delays, and the lack of a comprehensive, progressive regional plan to best utilize New England's regional airports.

2.1

Alternative 1A, the state proposal described by the Massachusetts Port Authority in its Draft Environmental Impact Statement/Report (DEIS/DEIR), details the agency's plan to expand and improve Logan. This alternative consists of the construction of Runway 14/32, as well as the construction of a new Centerfield Taxiway and the reduction of the approach minimums on Runways 22L, 27, 15R, and 33L. I am urging you to join me in opposition to the implementation of this alternative.

According to the aforementioned document, the primary reason for implementation of Runway 14/32 is to alleviate delays caused by the use of a less-than-three runway configuration when Logan is burdened by winds coming from the northwest. The operation of Runway 14/32 may alleviate some of these pressures of delay. However, this will only be true in Low Fleet conditions, when commuter aircraft represent a smaller share of the fleet serving Logan. In High Fleet scenarios, in which more planes are used and overscheduling becomes a factor in delays during peak times, Runway 14/32 becomes more of a hindrance than an assistance.

2.2

Massport projects that in a 37.5 million High Fleet passenger scenario, there will be approximately 250,000 annual hours of delay with the implementation of Alternative 1A. If Alternative 2 were implemented, which omits the construction of 14/32 but includes Peak Period Pricing, delays would amount to approximately 205,000 hours. The execution of Alternative 3, which consists of no infrastructure changes but requires the implementation of Peak Period Pricing and the reduction in the approach minimums on Runways 22L, 27, 15R, and 33L, results in 210,000 hours of delay. Under the 45 Million High Fleet scenario, similar percentages in the total annual hours of delay are present. As you can understand by these projections, if a High Fleet develops at Logan and overscheduling becomes a factor, Runway 14/32 is no longer effective without additional mitigating measures.

For decades, communities surrounding Logan International Airport have been adversely affected by hostile environmental conditions, including noise pollution, air pollution and ground traffic. Noise pollution has steadily increased over the years in Logan's neighboring communities such as Revere, Winthrop, and East Boston. Residents of these areas have battled consistently without much success in attempting to decrease existing levels of air traffic

Page 2
John P. DeVillars
April 7, 1999

over their communities. The operation of Runway 14/32 will cause a shift in the flight tracks over the Greater Boston Area and the volume of flights traveling over specific communities. The DEIR claims those communities that have experienced the heaviest volume of overflights, like Winthrop and East Boston, will endure less air traffic while other fringe communities, such as Everett, will bear a much greater number of overflights.

Although the runway will assist in lessening the intensity of noise in some affected areas, the implementation of 14/32 will widen the overall scope of communities exposed to noise levels greater or equal to 65 dB by 2%. Based on testing for Alternative 1A, Massport estimates that in a 29 Million Passenger Low Fleet scenario for 1999, the total population exposed to noise levels greater or equal to 65 dB is 17,909. However, the totals for Alternative 2 and 3 (16,892) and Alternative 4 (17,531), representing the continuation of present conditions at the airport, affect a smaller amount of residents in the Greater Boston area. This pattern is also apparent in the 1999 High Fleet and the 2010 noise levels for both the 37.5 Million Low and High Fleets.

I am firmly convinced that we must examine closely the status of our regional aviation transportation system before we implement any new structural changes at Logan International Airport. It is projected that the Route 128 and I-495 corridors will experience this commonwealth's greatest population increases as we approach the new millennium. It is the responsibility of both the federal and state governments to devise a strategy that ensures that some of the burden at Logan is relieved by those regional commercial airports that would welcome increases in regularly-scheduled passenger service. I agree with Boston Mayor Tom Menino that a "blue ribbon panel" should be established to devise such a regional aviation transportation strategy.

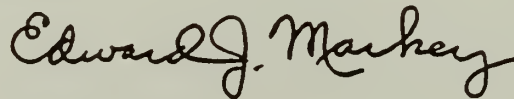
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2.4

We must consider the adverse environmental impacts on those communities surrounding this airport. The primary goal for its construction is to alleviate delays caused when Logan is burdened by heavy Northwest winds. In some future scenarios, this short-term solution will serve its intended purpose. However, without a plan for the optimal use of our regional airports to alleviate these pressures from Logan, I cannot support the implementation of a new runway or any additional expansion of Logan Airport.

Thank you in advance for your consideration. I look forward to reviewing the EPA's response to these concerns. If you have any questions or would like to further discuss this matter, please feel free to reach me by contacting my Medford District Office at (781)396-2900.

Sincerely,



Edward J. Markey

cc: Jane F. Garvey, Administrator
Federal Aviation Administration

Letter 2

US Congressman Edward J. Markey

Code	Topic 1	Topic 2	Comment	Response
2.1	Alternatives	Runway 14/32	The construction of this new runway would expand Logan's capacity for operations and increase its current potential for future growth.	<p>The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Logan Airport Airside analysis and GEIRs.</p>
2.2	Alternatives	Runway 14/32	In High Fleet scenarios, in which more planes are used and over scheduling becomes a factor in delays during peak times, Runway 14/32 becomes more of a hindrance [in reducing delays] than an assistance.	In the current environment, airline overscheduling is not a significant contributor to Logan Airport delays. Proposed Runway 14/32 and all other proposed projects would reduce current and future delays and enhance safety. The sooner that these improvements are implemented, the more long-term delay benefits will be realized.

Code	Topic 1	Topic 2	Comment	Response
2.3	Regional Transportation	Regional Airports	We must examine closely the status of our regional aviation transportation system before we implement any new structural changes at Logan International Airport. It is the responsibility of both the federal and state governments to devise a strategy that ensures that some of the burden at Logan is relieved by those regional commercial airports that would welcome increases in regularly scheduled passenger service.	Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of regional alternatives to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of regional alternatives to Logan Airport. In the Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.
2.4	Environmental Review Process	Blue Ribbon Panel	A "blue ribbon panel" should be established to devise such a regional aviation transportation strategy.	In January 2000, in response to the FAA's review of the Draft EIS the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies have concluded that The Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high-speed rail are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of regional transportation alternatives to Logan Airport and steps Massport has taken to foster increased use of these alternatives. Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999, attendance at a second summit in December 2000, and its assumption of operating responsibility for the Worcester Regional Airport in January 2000.

COMMITTEE ON RULES
RANKING DEMOCRATIC MEMBER

KEVIN RYAN
CHIEF OF STAFF
WASHINGTON

FREDERICK W. CLARK
DISTRICT DIRECTOR
BOSTON

E mail: jmoakley@mail.house.gov
URL: <http://www.house.gov/moakley>



Congress of the United States
House of Representatives
Washington, DC 20515-2109

(202) 225-6273
FAX (202) 225-3984

UNITED STATES COURTHOUSE
SUITE 3110
1 COURTHOUSE WAY
BOSTON, MA 02210
(617) 565-2920
(617) 439-5460
FAX (617) 439-5157

4 COURT STREET
TAUNTON, MA 02780
(508) 824-5576
FAX (508) 824-5520

BROCKTON FEDERAL BUILDING
166 MAIN STREET
BROCKTON, MA 02301
(508) 586-5555
FAX (508) 586-6592

LETTER 3

April 22, 1999

The Honorable Robert Durand
Secretary of Environmental Affairs
Executive Office of Environmental Affairs
Commonwealth of Massachusetts
Attention MEPA Office, EOEI No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Secretary Durand:

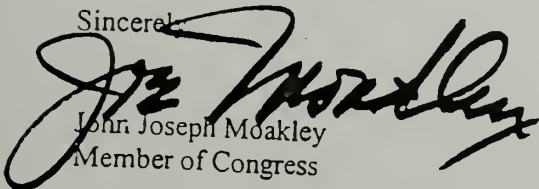
As United States Representative for the 9th Congressional District, I am submitting the attached letter to be included as part of the official public comment on the Draft Environmental Impact Statement and Draft Environmental Impact Report ("Draft EIS/EIR") for the Logan Airside Improvements Planning Project.

Please find attached a letter that I wrote to Federal Aviation Administrator Jane Garvey on March 29, 1999, which outlines my concerns with the Draft EIS/EIR in detail. It is my belief that the Draft EIS/EIR contains such serious deficiencies that the proposal should be withdrawn immediately.

The unfair negative environmental impact of proposed Runway 14/32 is simply too severe given the very limited and short term nature of its delay reduction benefits. Under no circumstances, should this proposal be approved. Instead, it is critical that this deeply flawed Draft EIS/EIR be replaced with a comprehensive, long term solution that fairly and effectively addresses our region's air transportation needs.

Thank you for your attention to this critical issue.

Sincerely,


John Joseph Moakley
Member of Congress

KEVIN RYAN
CHIEF OF STAFF
WASHINGTON

FREDERICK W. CLARK
DISTRICT DIRECTOR
BOSTON

E-mail: jmoakley@mail.house.gov
URL: <http://www.house.gov/jmoakley>



Congress of the United States
House of Representatives
Washington, DC 20515-2109

(202) 225-8773
FAX: (202) 225-3984

UNITED STATES COURTHOUSE
SUITE 3110
1 COURTHOUSE WAY
BOSTON, MA 02210
(617) 565-2920
(617) 439-5460
FAX: (617) 439-5151

4 COURT STREET
TAUNTON, MA 02720
(508) 824-6676
FAX: (508) 820-3520

BROCKTON FEDERAL BUILDING
166 MAIN STREET
BROCKTON, MA 02301
(508) 586-5555
FAX: (508) 580-4652

March 29, 1999

Mrs. Jane Garvey
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Garvey:

I am writing to express my serious concern with deficiencies in the Draft Environmental Impact Statement (EIS) on the Logan Airside Project, particularly as they pertain to the new proposed Runway 14/32. This document proposes to substantially expand Logan International Airport without adequately examining the significant environmental impact on communities surrounding the airport or the alternatives to Logan's expansion. These deficiencies are so substantial that the Federal Aviation Administration should withdraw support from the current document and re-evaluate solutions to Logan's delay issue.

Specifically, the EIS does not adequately comply with President Clinton's Executive Order on Environmental Justice of February 11, 1994. This order directs all federal agencies to identify and address all disproportionately high and adverse environmental effects of its programs, policies and activities on low-income and minority populations. This document ignores the basic requirement of identifying minority and low-income populations affected by proposals contained within the EIS, despite the fact that the document predicts substantial increases in air traffic over portions of the Boston neighborhoods of Jamaica Plain, Roxbury, South Boston, East Boston, the South End and the City of Chelsea. While these communities contain significant minority and low income populations, no effort is made within the EIS to identify these populations or to adequately address the disproportionately high environmental impact that Logan's expansion will have on these residents.

What is even more disturbing is that the EIS proposes this disproportionate environmental impact on the low income and minority residents in communities surrounding Logan Airport without fully examining a reasonable range of alternatives to Logan's expansion. At no point does the EIS analysis address the potential of increased utilization of Hanscom Field, a facility owned and operated by the Massachusetts Port Authority (Massport) that is in close proximity to the Boston. With a potential capacity of 320,000 operations annually and ready access to Boston via Route 128, Hanscom Field must be explored as should the prospect of building a second major airport. The EIS is also deficient in not treating increased utilization of existing regional airports including Manchester, T.F. Green (Providence) and Worcester as alternatives to Logan

3.1

3.2

expansion.

The EIS also fails in addressing a badly needed peak period management program for Logan Airport. Peak Period Pricing has been identified by analysts as an administrative option that offers significant delay reduction benefits. By only exploring the impact of Peak Period Pricing during favorable weather conditions based upon 110 operations per hour, the EIS fails to accurately reflect the benefits of this option during adverse weather conditions when delays are most problematic. The scope of analysis must be expanded to show the impact of this option when a variety of conditions dictate that Logan operate at 75, 85, 95, 105 and up to 115 movements per hour.

3.3

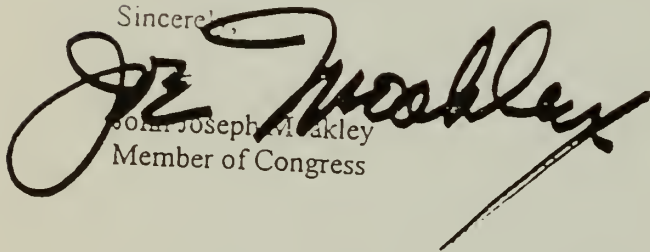
The EIS further fails to identify any reasonable maximum limit on activity that Logan Airport can accommodate. While the stated purpose of the proposed Runway 14/32 is to reduce delays at Logan Airport, Massport forecasts such a significant increase in the number of aircraft operations that delays will reach current levels within five years after the proposed runway is built. The negative environmental impact of proposed Runway 14/32 is simply too severe given the limited and short term nature of its delay reduction benefits. A clear and reasonable ceiling on operations at Logan must be established before any environmentally sound proposal to alleviate delay can be considered.

3.4

For these reasons, the current Draft Environmental Impact Statement for the Logan Airside Project is deficient and should be replaced with a study that is much broader in scope. This study must fully explore all possible alternatives to Logan expansion and place particular emphasis on environmental justice for the communities impacted by the airport. The Federal Aviation Administration should withdraw support for the proposal containing Runway 14/32 and work to replace it with a comprehensive, long term solution that effectively and fairly addresses our region's air transportation needs.

I greatly appreciate your outstanding leadership in planning and developing a safe and efficient national airports system and I look forward to working with you on this important issue.

Sincerely,


John Joseph Moakley
Member of Congress

Letter 3

US Congressman J. Joseph Moakley

Code	Topic 1	Topic 2	Comment	Response
3.1	Environmental Justice	Demographic Data	Specifically, the EIS does not adequately comply with President Clinton's Executive Order on Environmental Justice of February 11, 1994. This document ignores the basic requirement of identifying minority and low income populations affected by proposals contained within the EIS, despite the fact that the document predicts substantial increases in air traffic over portions of the Boston neighborhoods of Jamaica Plain, Roxbury, South Boston, East Boston, the South End and the City of Chelsea. While these communities contain significant minority and low income populations, no effort is made within the EIS to identify these populations or to adequately address the disproportionately high environmental impact that Logan's expansion will have on these residents.	<p>The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
3.2	Regional Transportation	Regional Airports	The EIS proposes this disproportionate environmental impact without fully examining a reasonable range of alternatives to Logan's expansion. At no point does the EIS analysis address the potential of increased utilization of Hanscom Field. The EIS is also deficient in not treating increased utilization of existing regional airports including Manchester, T.F. Green (Providence) and Worcester as alternatives to Logan expansion.	<p>The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis on an appropriate range of alternatives as required by Federal and state scoping directives issued under NEPA and MEPA irrespectively. Further analysis in these environmental review documents indicates that there is no disproportionate environmental impact associated with the Preferred Alternative.</p> <p>The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR provide an evaluation of the regional airports at T. F. Green/Providence, Manchester, and Worcester and their potential impacts on Logan Airport. Hanscom Field is the region's premier general aviation facility and accommodated over 180,000 aircraft operations in 1998. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the greater Boston area. This will provide some relief to the growth pressures at Logan Airport. Nevertheless, the proposed Logan Airport Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport. The FAA will be an active participant in the upcoming New England Airports System Study which will evaluate the impact of recent regional airport developments on Logan Airport, identify constraints to regional airports growth and highlight strategies for optimizing New England's regional aviation system. Refer to Section 2.9 of the Supplemental DEIS/FEIR.</p>
3.3	Alternatives	Peak Period Pricing	The EIS also fails in addressing a badly needed peak period management program for Logan. The scope of analysis must be expanded to show the impact of this option....	The Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR contain analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
3.4	Alternatives	Operational Restrictions	The EIS further fails to identify any reasonable maximum limit on activity that Logan Airport can accommodate. A clear and reasonable ceiling on operations at Logan must be established before any environmentally sound proposal to alleviate delay can be considered.	The Airside Project will not change Logan Airport's airfield capacity of approximately 120 aircraft operations per hour. Regarding caps on airport operations, federal constitutional provisions (preemption, commerce clauses, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. Massport has undertaken a comprehensive mitigation program, such as Logan Airport Noise Rules, for those areas that fall within its powers as proprietor of Logan Airport, which are not preempted under federal law.



UNITED STATES DEPARTMENT OF COMMERCE
Office of the Under Secretary for
Oceans and Atmosphere
Washington, D.C. 20230

March 23, 1999

LETTER 4

Mr. John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, Massachusetts 01803

Dear Mr. Silva:

Enclosed are comments on the Draft Environmental Impact Statement for Logan Airside Improvements Planning Project Boston, Massachusetts. We hope our comments will assist you. Thank you for giving us an opportunity to review this document.

Sincerely,

Susan B. Fruchter
Acting NEPA Coordinator

Enclosure

MEMORANDUM FOR: Susan B. Fruchter
Acting NEPA Coordinator

FROM: Charles W. Challstrom
Acting Director, National Geodetic Survey

SUBJECT: DEIS-9902-04-Logan Airside Improvements Planning Project
Boston, Massachusetts

The subject statement has been reviewed within the areas of the National Geodetic Survey's (NGS) responsibility and expertise and in terms of the impact of the proposed actions on NGS activities and projects.

All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the NGS home page at the following Internet World Wide Web address: <http://www.ngs.noaa.gov>. After entering the NGS home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the NGS data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

If there are any planned activities which will disturb or destroy these monuments, NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any relocation(s) required.

4.1

For further information about these monuments, please contact Rick Yorczyk; SSMC3, NOAA, N/NGS; 1315 East West Highway; Silver Spring, Maryland 20910; telephone: 301-713-3230 x142; fax: 301-713-4175.

Letter 4

Department of Commerce, Susan B. Fruchter

Code	Topic 1	Topic 2	Comment	Response
4.1	Construction	Mitigation	If there are any planned activities which will disturb or destroy [horizontal and vertical geodetic control monuments] NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any relocation(s) required.	<p>The Preferred Alternative will not result in any disruption, destruction, or relocation of any horizontal or vertical geodetic control monuments.</p> <p>NGS will be notified prior to construction if any NGS monuments are identified.</p>



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

LETTER 5



ER-99/193

Mr. Robert S. Bartanowicz
Regional Administrator
New England Region
Federal Aviation Administration
12 New England Executive Park
Burlington, Massachusetts 01803

Dear Mr. Bartanowicz:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Impact Statement/Section 4(f) Evaluation for the Logan Airside Improvements Planning Project, Logan International Airport, Boston, Suffolk County, Massachusetts.

We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met. We also concur with the proposed measures to minimize harm to Section 4(f) resources. However, we recommend continued cooperation and coordination with the State Historic Preservation Officer in order to determine whether a Memorandum of Agreement (MOA) is needed to avoid and/or minimize harm to cultural resources which may be affected by the proposed project, in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. A signed copy of the MOA should be included in the Final Section 4(f) Evaluation, if one is prepared.

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The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc: Ms. Trudy Cox, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Code	Topic 1	Topic 2	Comment	Response
5.1	Alternatives	Preferred Alternative	We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met.	Comment noted.
5.2	Open Space/ Parkland	Section 4 (f)	We recommend continued cooperation and coordination with the State Historic Preservation Officer in order to determine whether a Memorandum of Agreement (MOA) is needed to avoid and/or minimize harm to cultural resources which may be affected by the proposed project, in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. A signed copy of the MOA should be included in the Final Section 4(f) Evaluation, if one is prepared.	The FAA and Massport have consulted with the Massachusetts Historical Commission (MHC). The MHC has concurred with the FAA's determination that the Preferred Alternative will have no adverse effect on significant historic properties. Refer to Section 6.3.2 of the Supplemental DEIS/FEIR for a description of historic properties, project impacts and mitigation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

LETTER 6

OFFICE OF THE
REGIONAL ADMINISTRATOR

April 22, 1999

John Silva
Manager, Environmental Programs
Airports Division, ANE-600
Federal Aviation Administration
New England Regional
12 New England Executive Park
Burlington, Massachusetts 01803

RE: Draft Environmental Impact Statement/Report Logan Airside Improvements Planning
Project dated February, 1999 (EPA ERP Number D-FAA-B51017-MA)

Dear Mr. Silva:

In accordance with EPA's responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) prepared by the Federal Aviation Administration (FAA) and the Massachusetts Port Authority (Massport) for proposed airside improvements at Logan Airport in Boston, Massachusetts.

The project includes construction of a new runway (runway 14/32), new taxiways and taxiway alignments, and reductions in approach minimums on runways 22L, 27, 15R and 33L. In addition to the no-build alternative, the DEIS analyzes four sets of alternatives and evaluates the relative effectiveness of each in enhancing operational safety and reducing current and future aircraft delay at Logan caused by northwest wind and weather conditions. Airport delays are presented in the context of forecasts for the year 2010 that predict between 37.5 to 45 million passengers a year using Logan, a number substantially greater than Logan's 26.5 million passengers in 1998. The range of alternatives in the DEIS focuses solely on "airside" improvements as a means of eliminating delay.

EPA has long opposed efforts to expand the capacity of Logan Airport without first (1) adequately mitigating noise and pollution impacts to surrounding communities and the region from existing operations, and (2) adopting a comprehensive, multi-modal regional transportation strategy. EPA has raised these concerns each time Massport has proposed improvements to Logan, including in our scoping comments for this EIS in November, 1995. Regrettably, the

proposed project and the EIS fail to adequately address either of these concerns. Therefore, when considered in the context of the already significant burden on surrounding communities from existing airport operations and the absence of an underlying regional transportation strategy, I believe the project cannot be justified.

Specifically, my objections are as follows:

- **The significant community impacts of current Logan operations must be fully addressed and mitigated before any expansion of operations is considered.** The burden borne by the communities near Logan is already enormous, and the efforts to mitigate this burden currently fall short of the mark. The soundproofing of homes now exposed to high levels of aircraft noise, while of limited value (given that it only reduces noise exposure for people when they are inside buildings with shut windows and is not effective in homes exposed to higher than 70 dBA), is nevertheless an essential commitment whose implementation is as yet not completed. Valid concerns have been raised about the computer model used to identify homes eligible for soundproofing. Thus, while the DEIS promises as mitigation the soundproofing of all homes newly exposed to high levels of aircraft noise as a result of the proposed project, there remains uncertainty as to whether the mitigation covers enough homes, and whether Massport and FAA will have adequate funding to carry out this commitment. EPA is especially concerned that FAA has historically not fully funded its share of the soundproofing program for Logan.

In addition, commitments for improvements to the Blue Line Station at Logan, which were to provide same-level platform connections between the subway and shuttle buses and thereby improve transit access and reduce traffic, have not been kept. Given the impacts currently felt by affected communities and the inadequacy of previously promised relief, it is not reasonable to ask these communities to accept the impacts of further expansion at Logan unless and until current impacts are fully mitigated.

- **The DEIS fails to consider adequately environmental justice issues, specifically whether there are disproportionate environmental impacts to low-income and minority populations.** The environmental justice analysis in the DEIS does not meet federal obligations concerning environmental justice. This is especially problematic in light of the fact that the proposed project will result in a threefold increase in aircraft overflights in East Boston, Chelsea, Roxbury, and other communities with large populations of low-income and minority people. The brief and narrowly focused discussion of this important subject falls short in several ways. First, FAA's and Massport's conclusion that minority and low-income communities do not experience disproportionately high impacts does not appear to be credible. The analytic basis for the conclusion is insufficient since critical demographic and other relevant health data are missing. Moreover, the DEIS does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the project's impacts. Second, the environmental justice analysis in the DEIS focuses solely on noise and ignores credible public comments identifying air quality, odor, traffic and other

impacts that cumulatively burden surrounding communities with high percentages of low-income and minority populations. For all of the above reasons, the cursory attention to environmental justice issues in the DEIS is not acceptable.

The DEIS does not reflect a regional, long-term strategy for New England's transportation infrastructure. Massport and the FAA cannot look solely to airside improvements to address its flight delay problems. The DEIS thoroughly describes the positive steps that Massport and the FAA have taken to contribute to regional transportation planning, including their support for use of regional airports. But the core of the analysis nevertheless simply assumes that Logan's flight operations will grow unchecked over the next decade regardless of successful development of alternatives, and does not include in its analysis broader options to manage Logan's growth and the resulting delays. In order to manage growth so that it reduces rather than increases environmental impacts on nearby communities, Massport and the FAA must pursue even more aggressively a long-term, multi-modal regional transportation strategy.

Our challenge is a transportation challenge, not simply an aviation challenge, and thus requires the full and active investment of time and resources by not only Massport and the FAA but also other state and federal transportation agencies such as the Executive Office of Transportation and Construction, Amtrak, and the U. S. Department of Transportation. The goals should be 1) to increase alternatives to air travel through Logan, not only through use of T. F. Green in Rhode Island, Worcester Airport in Massachusetts, Manchester Airport in New Hampshire and other regional airports, but also through intercity high-speed rail connections supported by a North-South Station link; 2) to establish efficient mass transit access to and between the regional airports; and 3) to reduce Logan's traffic impacts on surrounding communities by such measures as a free shuttle service between South Station and Logan, an intermodal terminal at Route 128, and the Urban Ring.

In addition, Massport should reduce the small plane mix from Logan's peak traffic hours through a peak period pricing strategy, implemented with appropriate sensitivity to the needs of communities served exclusively by smaller aircraft. Additional analysis is critical to determine whether the imposition of peak period pricing now would help send the necessary market signals to ensure that airlines' plans result in the most efficient use of Logan Airport (including smarter use of other regional airports, and, for smaller carriers, the use of planes capable of handling more passengers). Absent a comprehensive plan, the DEIS projects that within five years of project completion, delays at Logan will exceed current levels. This forecast suggests that unchecked growth cannot be a responsible planning assumption for this airport. The efforts of Massport and other regional transportation officials should be aimed first at developing a comprehensive plan, not a narrowly-focused airside improvement project with only short-term effects on delays at Logan.

The DEIS's analysis of noise impacts rests on questionable model inputs and precepts. The affected communities have raised serious and credible concerns about the

ability of the computer modeling relied upon in the DEIS to accurately reflect noise levels associated with Logan operations and to select homes eligible for soundproofing. These concerns are based on in situ noise monitoring which appears to demonstrate that computer modeling underestimates actual noise levels, at least in some neighborhoods. The DEIS does not properly address this deficiency and thus does not adequately represent the likely actual noise impacts. Furthermore, the noise increases to neighborhoods that fall outside the FAA's 65-dBA contour remain inadequately acknowledged and addressed, as do the very high noise levels that occur each time aircraft fly over or by neighborhoods. The DEIS does not fully disclose the sleep disruption and other impacts that occur in these instances, nor does it address cumulative noise impacts to account for all noise, not just modeled aircraft noise, as is required under NEPA. In addition, the use of 1993 is not appropriate as the base year for analysis as it does not represent existing conditions and may minimize the relative noise impacts from the preferred alternative when compared with what appears to have been an especially noisy base year.

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The DEIS analyses ignore the critical question of whether the improvements will spur additional growth at the airport. In comparing the alternatives, both the noise and air quality analyses assume that the future passenger/flight operations growth at Logan will remain constant regardless of whether or not the runway 14/32 is constructed. The analysis thereby avoids any serious consideration of what appears to be one of the most critical questions posed by this project-- whether the proposed improvements, especially when combined with landside improvements, cumulatively facilitate future growth in flight operations and passenger traffic with corresponding increases in noise, traffic, and air pollution impacts.

6.16

Efficient operations at Logan are clearly important to the New England economy. However, efficiency gains through proposed infrastructure improvements should only be advanced if they can be achieved without sacrificing the well-being of the communities around the airport and the region at large. Smart growth requires efficient transportation, but it also requires that we preserve and enhance the livability of established, urban communities. A comprehensive transportation strategy that looks beyond quick fixes at Logan can meet both goals. As discussed in this letter and in the attachment, the current DEIS presents a project with serious impacts in an analysis that lacks adequate consideration of alternate strategies to achieve project goals. I request that Massport and FAA withdraw the DEIS and instead focus on developing a more comprehensive regional approach to transportation in New England. I would be pleased to work with Massport, the FAA, and the affected communities in the region to that end.

Despite the concerns expressed in this letter and the attached analysis, I want to acknowledge the professional and fully cooperative spirit of Massport and the FAA in their work with us since the DEIS was published. Peter Blute, Betty Desrosiers, and their team have demonstrated a total commitment to honest, open dialogue with EPA. They have advanced their arguments professionally and forcefully and without fail have responded thoughtfully to our questions. For this we owe them our appreciation and respect.

Please feel free to contact me or Elizabeth Higgins of my staff at 617/918-1051 if you wish to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "J P DeVillars". The signature is fluid and cursive, with the first name "John" and last name "DeVillars" clearly distinguishable.

John P. DeVillars
Regional Administrator

Attachment

cc:

Governor Paul Cellucci
Peter Blute, Massport
Robert Durand, EOEa

Attachment to EPA's Comment Letter on Logan Airside Improvements Planning Project

The Draft Environmental Impact Statement (DEIS) for the proposed airside improvements at Logan Airport fails to provide an adequate review of the environmental impacts and the full range of alternatives to the project. The preceding cover letter summarizes the primary conclusions from EPA's review of the DEIS. This attachment provides support for those conclusions and raises some additional technical concerns.

Narrow Scope of DEIS Analysis and Alternatives

Failure to Address EPA's EIS Scoping Comments: The DEIS fails to address fundamental issues raised in EPA's 1995 scoping letter. Most importantly, the scope of the DEIS, with its focus on construction of proposed runway 14/32 and the taxiway improvements, is too limited and fails to seriously consider regional improvements as alternatives to the Logan runway project. The limited scope of analysis represents a missed opportunity for a comprehensive analysis and merely compounds difficult decision making surrounding changes to Logan's operations. As EPA indicated in its previous comments, the DEIS should have identified a targeted regional strategy including both existing and potential capacity, as well as regional pricing and marketing to enhance the capacity and efficiency of, and access to, all New England airports. The FAA, as the federal agency responsible for our nation's air travel, has a responsibility to maximize the regional efficiency of the airport network in New England. In this case, EPA would expect the FAA to coordinate the efforts of Massport and the other regional airports, but also to actively involve other federal counterparts at the Federal Transit Administration and the U. S. DOT to explore regional strategies to increase the availability of other airports as an alternative to Logan. Further, Massport has a responsibility to work closely with the appropriate state and federal agencies to develop such a regional strategy.

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As EPA indicated in comments on the DEIS scope, the airside and landside projects are functionally linked, and as such, they should be evaluated together in a comprehensive EIS. The current analysis focuses entirely in airside issues with no real analysis of opportunities for Massport to integrate landside and airside planning to enable Logan to improve operations and handle the substantially greater numbers of passengers anticipated for the coming decades. In response to our scoping comments, the DEIS explains that the analysis is based on background planning information provided in the state Generic Environmental Impact Report (GEIR) and that the DEIS is based on the FAA scope which was developed through a public comment process. Unfortunately, our comments on the appropriate scope of analysis for the EIS were largely discounted, and the GEIR, a document prepared under the rules of state law, does not meet the requirements of NEPA. Thus, reliance on the GEIR to satisfy NEPA's requirements for a cumulative impact analysis is not appropriate.

6.18

Need to Focus on Regional, Multi-Modal Transportation Plan: EPA recommends that, rather than proceeding with the environmental review of the taxiway and runway improvements, Massport and FAA focus instead on establishing a strategy to make Logan Airport a more efficient transportation center with less impact on surrounding communities, by improving mass transit access to the Airport and preventing growth in the number of flight operations.

6.19

One means to reduce the growth pressures on Logan Airport is to enhance the current intercity transportation options. The DEIS does reflect the fine and successful work by both private enterprise and regional transportation officials to encourage greater use of Green and Manchester Airports and to complete the high-speed rail link with New York. Without question, these efforts will improve travel options for New Englanders and better manage growth at Logan Airport. However, Massport, in cooperation with EOTC, U. S. DOT, Amtrak, and other transportation agencies, should take active measures to promote high speed rail as one of the best alternatives to air travel that could help to reduce demands on Logan. These efforts should not be limited to high speed rail but should also encourage and market the use of other regional airports to the benefit of Logan and surrounding communities. Moreover, we believe the EIS should clearly identify mitigation commitments by Massport to improve mass transit to those airports and to solidify transit links among the regional airports similar to the bus links available between Dulles and National or LaGuardia and JFK.

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In addition, the implementation of peak period pricing should be a piece of the regional transportation strategy. Peak period pricing, implemented with sensitivity to the needs of New England communities served by smaller airports that rely principally on smaller aircraft, could serve to reduce flight operations during peak hours and increase the proportional share of larger aircraft, thereby making the airport more efficient in handling a large volume of passengers with fewer aircraft operations. The DEIS clearly demonstrates that peak period pricing would serve to lessen delays substantially in the high growth future scenarios (e.g., 45 million passengers/high fleet, 45 million passengers/low fleet or 37.5 million passengers/high fleet). However, the DEIS concludes that peak period pricing is not warranted because current flight operations do not exceed 120 operations per hour. Under current conditions approximately 40 percent of the operations at Logan serve approximately 10 percent of the passengers in regional aircraft. If 22 percent of the operations were to handle the same number of passengers, Logan could operate comfortably at 95-100 movements an hour. Additional analysis is critical to determine whether the imposition of peak period pricing now would help send the necessary market signals to ensure that airlines' plans result in the most efficient use of Logan Airport (including smarter use of other regional airports and, for smaller carriers, the use of planes capable of handling more passengers). Massport shares this responsibility with the airlines. Such an evaluation should include an appropriate sensitivity analysis to help determine the operations/hour level where peak period pricing becomes effective.

6.22

According to the DEIS, Massport appears willing to consider peak period pricing only when Logan actually experiences over scheduling. For this measure, Massport is prepared to wait and see if peak period pricing is necessary. On the other hand, the DEIS details Massport's argument that it needs a new runway now, despite the exponential growth in passenger traffic through Green and Manchester. Following such logic, EPA questions why Massport doesn't wait on its

6.23

decision to construct a new runway until it is clear whether the region really needs an expanded Logan, thereby giving the regional airports a chance to capture more traffic, consistent with the impressive gains made at Manchester and Green.

Additional delay reduction benefits may be obtained from managing/prioritizing takeoffs so that large planes with more passengers are given preference over smaller planes during peak periods of delay. Such a change may help to shift the market to fewer larger planes making fewer flights or scheduling changes by smaller planes to avoid periods of peak operation prone to delay.

6.24

Finally, the proposed project offers only short term relief (five years) for delay problems it is intended to resolve. Massport should extend the planning horizon for the analysis (currently only at ten years) as part of supplemental efforts to investigate longer term solutions. The solutions should actively integrate Logan operations with regional transportation planning (airside and landside integration).

6.25

Air Quality Analysis

General: Because of the substantial growth in operations at Logan Airport, the DEIS generally reflects no significant improvements in air quality attributable to the Airport. Under the future scenarios for the year 2010 evaluated in the DEIS, the number of passengers are forecast to increase from 1998's 26.5 million passengers to 37.5 or 45 million passengers. More significantly, aircraft operations are forecasted to increase from 1998's 507,000 to between 543,000 and 656,000 operations. Increases in aircraft operations projected in the DEIS will result in additional air pollution, offsetting the anticipated benefits of lower-emitting aircraft and other airport-related vehicles. Despite reductions in emissions from individual aircraft, ground vehicles, and passenger cars as a result of tighter emission standards and fleet turnover, the DEIS finds that emissions of nitrogen oxides (NO_x), volatile organic compounds (VOC) and carbon monoxide (CO) will remain roughly the same or increase slightly by 2010. Because of the increase in aircraft operations, the affected communities will not share in the full benefits of lower emission levels from many of the individual sources of pollution.

The DEIS's conclusion that the preferred alternative will have the least negative air quality impacts is a result of certain questionable assumptions. The DEIS finds that the preferred alternative (taxiway improvements and Runway 14/32) will result in lower emissions of the pollutants CO, VOCs, and NO_x than any of the other alternatives, including the no action alternative. The air quality analysis assumes that the airport-related motor vehicle emissions and the number of flight operations will be identical for all the alternatives. The only variables among the alternatives are emissions attributable to airside delays. Consequently, the preferred alternative, which results in the least delays, inevitably has fewer emissions.

6.26

Unfortunately, these assumptions underlying the air quality analysis ignore the possibility that certain alternatives may result in more passengers or more flight operations. If the airport increases its airside efficiency and reduces delays, it is plausible that airlines will choose to increase flights to Logan (as opposed to regional airports such as Manchester, Green or Worcester). Without an analysis of whether an additional runway will affect future growth of

flight operations, the validity of the air quality conclusions (that Runway 14/32 and taxiway improvements will result in fewer emissions than the alternatives) are questionable. The DEIS should have analyzed whether increased airside efficiency affects the number of flight operations in the future. If the answer is yes, the air quality analysis should be structured in a way to discern the true comparative impacts of each alternative.

Additional Technical Air Analysis Comments:

National Ambient Air Quality Standard (NAAQS) for Fine Particulate Matter: Table 5.3-1 reflects the current NAAQS for criteria pollutants. However, the table contains the incorrect 24-hour NAAQS for fine particulate matter. Rather than 50 ug/m, the standard is 65 ug/m. (Note: While EPA proposed a 24-hour standard of 50, the final standard was set at 65 ug/m.)

6.27

Use of Revised Ozone Standard: In Section 5.3.1.2 (page 5-41 and 42), the Draft EIS/R reflects ambient levels of criteria air pollutants measured at the three closest Massachusetts DEP monitoring stations. These levels are reflected in Table 5.3-2. The Draft EIS/R compares these ambient levels with the one-hour ground-level ozone standard of 0.12 part per million (ppm). In July 1997, EPA revised its ozone standard to an eight-hour standard of 0.08 ppm. The DEIS should use this more stringent standard as the point of comparison.

6.28

Environmental Justice

Federal Environmental Justice Policy

The DEIS does not satisfy either the stated intent or the specific directives of the federal environmental justice policy. The obligations of the FAA to address environmental justice issues are grounded in at least three separate mandates: 1. Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations; 2. Department of Transportation Order on Actions to Address Environmental Justice in Minority Populations and Low-income Populations; and 3. Environmental Justice Guidance under the National Environmental Policy Act issued by the Council on Environmental Quality. In developing a DEIS, these documents direct FAA to

- collect and analyze data relevant to environmental justice issues,
- analyze adverse impacts,
- explore issues of cumulative exposure,
- examine public health issues,
- look broadly at interrelated social, cultural, and economic effects, and
- develop strategies for meaningful public participation.

The Executive Order: Under the Executive Order, Federal agencies should identify and address disproportionately high and adverse human health or environmental effects of their activities on minority and low-income populations, and provide meaningful public participation in meeting that objective. The Executive Order articulates two requirements regarding the need to develop data that can be used to perform relevant analysis in the NEPA context. First, each federal

agency should collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. An agency then should use that information to determine whether its programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority and low-income populations. Second, each federal agency should collect, maintain, and analyze information on the race, national origin, and income level for areas surrounding facilities expected to have substantial environmental, human health, or economic effects on the surrounding populations.

The DOT Order: Under the DOT Order, activities – including planning activities – with the *potential* to have disproportionately high and adverse effects¹ on human health or the environment are sufficient to trigger the need to consider effects on minority and low-income populations.

Further, the DOT Order explicitly addresses the issue of preventing disproportional and high adverse impacts. In that context, it directs DOT to administer its programs in a manner consistent with requirements under NEPA so as to identify the risk of discrimination early in the program or policy development process. In implementing the requirements under NEPA, the Agency is directed to obtain the following information:

- population served and/or affected by race, color or national origin, and income level;
- proposed steps to guard against disproportionately high and adverse effects on the basis of race, color, or national origin; and
- present and proposed membership by race, color, or national origin in any

¹The DOT Order defines adverse effects very broadly. Adverse effects are the totality of significant individual or cumulative human health or environmental effects including interrelated social and economic effects which may include but are not limited to

- bodily impairment, infirmity, illness or death
- air, noise, and water pollution and soil contamination
- destruction or disruption of man-made or natural resources
- destruction or diminution of aesthetic values
- destruction or disruption of community cohesion or a community's economic vitality
- destruction or disruption of the availability of public and private facilities and services
- vibration
- adverse employment effects
- displacement of persons, businesses, farms, or nonprofit organizations
- increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community
- denial of, reduction in, or significant delay in the receipt of benefits of DOT programs, policies, or activities

planning or advisory body.

In addition, the DOT Order identifies actions to address disproportionately high and adverse effects. DOT agencies are directed to ensure that programs and policies having disproportionately high and adverse effects on minority or low-income populations will only be carried out if further mitigation measures or alternatives avoiding or reducing those effects are not practicable. In determining practicability, the social, economic, and environmental effects of the mitigation will be taken into account.

Finally, the DOT Order contemplates meaningful opportunities for public involvement by minority and low-income communities during the planning and development of DOT activities. Specifically, the agency is to provide the public information addressing the concerns of minority and low-income populations regarding health and environmental impacts.

CEQ Guidance: The CEQ guidance defines key terms in Executive Order 12898.² CEQ recommends that the additional guidance be applied with flexibility and that its defined terms be considered "a point of departure rather than conclusive direction in applying the terms of the Executive Order."

The CEQ guidance clearly states that environmental justice principles are "wholly consistent with the purposes and policies of NEPA." Although there is no standard formula for identifying environmental justice issues in NEPA reviews, agencies are expected to address the issues in a clear, concise, and comprehensible manner. In particular, agencies should consider

- public health data and industry data concerning the *potential for multiple or cumulative exposure* to health or environmental hazards in the affected population *even if the effects of such exposure are not within the control or subject to the discretion of the agency proposing the action,*
- historical patterns of exposure to environmental hazards, and
- interrelated cultural, social, occupational, historical, or economic factors that may amplify natural and physical environmental effects (such factors should include the physical sensitivity of the community to particular impacts, the effect of any disruption on community structure, and the nature and degree of the impact on the physical and social structure of the community).

Because environmental justice issues may arise at any point in the NEPA process, CEQ encourages agencies to consider those issues "at each and every step of the process."

²The defined terms include: low-income population, minority, minority population, disproportionately high and adverse human health effects, disproportionately high and adverse environmental effects.

agency should collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. An agency then should use that information to determine whether its programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority and low-income populations. Second, each federal agency should collect, maintain, and analyze information on the race, national origin, and income level for areas surrounding facilities expected to have substantial environmental, human health, or economic effects on the surrounding populations.

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- destruction or disruption of man-made or natural resources
- destruction or diminution of aesthetic values
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- destruction or disruption of the availability of public and private facilities and services
- vibration
- adverse employment effects
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- increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community
- denial of, reduction in, or significant delay in the receipt of benefits of DOT programs, policies, or activities

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- public health data and industry data concerning the *potential for multiple or cumulative exposure* to health or environmental hazards in the affected population *even if the effects of such exposure are not within the control or subject to the discretion of the agency proposing the action,*
- historical patterns of exposure to environmental hazards, and
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Because environmental justice issues may arise at any point in the NEPA process, CEQ encourages agencies to consider those issues "at each and every step of the process."

²The defined terms include: low-income population, minority, minority population, disproportionately high and adverse human health effects, disproportionately high and adverse environmental effects.

At the outset, in the scoping phase of the NEPA process, agencies should determine the demographics of the affected area.

In the alternatives phase, if the agency has concluded that a disproportionately high and adverse health or environmental impact on minority or low-income populations will result from the proposed action or alternatives, CEQ directs the agency to consider the distribution as well as the magnitude of the disproportionate impacts. In weighing that factor, the agency should consider input from the affected community as well as the magnitude of the impacts associated with alternatives having less disproportionate adverse effects on minority or low-income populations.

In the analysis phase, after identifying a disproportionately high and adverse health or environmental effect on a minority or low-income population, CEQ directs agencies to analyze how such effects are distributed within the affected community. CEQ recommends that any available data be displayed spatially so that the public can see the distribution of health and environmental impacts among the demographic population groups. The display should be modified to reflect any additional qualitative or quantitative information obtained through the public participation process.

If an agency has identified potential environmental justice issues, the agency is directed to state clearly and concisely in the DEIS whether a disproportionately high and adverse health or environmental impact on minority and low-income populations is likely to result from the proposed action. The Agency should cite specific information so that the public can understand the rationale for the agency's conclusion.

Agencies also are directed to develop effective public participation strategies including active outreach to affected groups and to assure meaningful community representation as early as possible at all stages of the process.

FAA Compliance with Federal Environmental Justice Policy

As stated previously, the DEIS does not satisfy either the intent or the specific directives of the federal government's environmental justice policy as expressed in the Executive Order, the DOT Order, and the CEQ Guidance. The DEIS does not demonstrate an effort to implement that policy proactively. Despite CEQ's statement that its guidance should be applied with flexibility, the DEIS uses extremely narrow definitions of low-income and minority populations. Use of such narrow definitions allows the FAA to conclude that there are no environmental justice issues because so few people fall within the narrowly defined categories. Major deficiencies in the DEIS are identified below.

6.29

Data Collection and Analysis: The DEIS presents no detailed demographic data for the communities surrounding Logan Airport nor does it identify the impacted community with any geographic precision. The impacted community is only identified by noise contours presented on a very small-scale map. There is no explanation regarding the issues considered in identifying the study area. There is no map clearly indicating the location of the study area.

6.30

Although required by the DOT Final Order, the DEIS does not define the populations served or affected by race, color, national origin, and income level. Table 8.7-1 is the only table presented in the environmental justice analysis. That table does not clearly indicate where the noise-exposed population is located, nor does it provide any detail in describing the demographics of that population. It is impossible for any individual citizen to tell from the table whether he or she is in the noise exposed population. In addition, none of the information is mapped so that the public can see the distribution of health and environmental impacts across population groups.

6.31

Adverse Impacts: Contrary to the requirements of the Executive Order and the DOT Order, the DEIS presents little data and analysis on a broad range of potential adverse impacts. Because the environmental justice analysis in the report is brief and provides little basis for its conclusion that noise is the only adverse impact, especially in the context of cumulative impacts, it is impossible to review the rationale or data used in reaching that conclusion. Ironically, that is just the circumstance that federal environmental justice policy is intended to remedy.

6.32

Cumulative Exposure: The CEQ Guidance directs agencies to consider the potential for multiple or cumulative exposure to health and environmental hazards even if the effects of the cumulative exposure are not within the control of the agency action. The DEIS offers no information regarding the health of the communities surrounding Logan. There is no mention of historical patterns of exposure to environmental hazards. There is no meaningful discussion of multiple or cumulative exposure. And there is no opportunity to review the conclusions regarding cumulative exposure in the DEIS since there is no detailed description of other sources to which low-income and minority communities surrounding Logan are exposed. EPA understands that, for purposes of determining eligibility of homes for soundproofing, FAA may only rely on noise generated by aircraft operations. However, in preparing the environmental justice portion of the DEIS, the cumulative noise impacts from all sources in affected neighborhoods is a critical consideration.

6.33

Health Issues: Despite the requirement in the Executive Order, the DOT Order, and the CEQ Guidance that public health issues be examined, there is no discussion of the public health issues often raised by minority and low-income communities, such as asthma, respiratory distress, or attention deficit disorder. Most remarkably, there is no discussion of hearing loss, an obvious health concern to any population exposed to excessive noise. Without any discussion of baseline health conditions, it is impossible to evaluate the incremental impacts or risk associated with the proposed agency action.

6.34

Social, Cultural, and Economic Factors: Although it is required by the CEQ Guidance, there is no discussion of interrelated social, cultural, occupational, historical, and economic factors that may increase the environmental effects of the proposed action. The DEIS does not address factors seemingly relevant at Logan Airport, including the physical sensitivity of the community to specific impacts, the effect of any disruption on community structure, and the nature of the impact on the physical and social structure of the community. For example, the DEIS appears to assume that soundproofing completely addresses noise impacts in a neighborhood. There is no mention that over-flights impair residents' use of their porches or yards. Double-pane windows cannot protect the conversations on the street and front stoop that bind a community together.

6.35

Public Participation: Rather than responding directly to community concerns, the FAA instead often focuses on its compliance with process requirements. Many substantive issues were raised in comments on the scoping document. Often the response to those comments merely noted the public participation process without responding substantively in a manner indicating that the comment was considered carefully. EPA understands that Massport did have a series of meetings several years ago on these airside improvements. However, several community groups and members of Logan's Citizens Advisory Council complained to EPA that Massport and FAA failed to respond to specific requests made from October 1997 to late 1998 to engage in a concrete discussion with the community about plans for air side improvements at Logan, and that when the consultation did resume, it was just before release of the DEIS. Community input during this final decision-making period would have been particularly appropriate.

6.36

Noise Analysis

General Comments: It remains unclear how Massport and the FAA will be able to comprehensively "guarantee" unidirectional use (over the harbor only) of Runway 14/32. Without such a guarantee, it is uncertain whether assumptions about noise impacts from runway 14/32 accurately characterize future conditions. The EIS argues that the proposed new runway will help Logan to attain PRAS goals. There are two problems with this premise. First, based on the recent public debate concerning PRAS goals, it is not evident that these goals reflect current community interests. Second, the focus on PRAS goals as a benefit of the proposed runway inappropriately shifts the focus away from consideration of alternatives to reduce use of Logan (or air travel for that matter) as a means to eliminate delay. Asserting that the FAA will be able to distribute noise impacts more flexibly across impacted communities does nothing to address the question of whether those noise impacts are necessary or adequately mitigated.

6.37

6.38

Technical Comments

1. Use of 1993 as Base Year: The use of 1993 as the base year is not appropriate. In general, the normal airport analysis starts with a base year that represents the current situation. Clearly, the use of 1993 data does not provide the reader with the current situation, particularly as it relates to aircraft type, aircraft operations, population and residences. While it may be true that the 1993 noise impacts were a "worst case" due to the large number of stage 2 aircraft, we do not believe that it represents the current situation. Moreover, the comparison of the alternatives with a particularly high noise year may serve to minimize what might otherwise be significant changes from the current 1999 level of noise experienced by nearby community residents. For historic purposes it may be of some use, but it should not replace the current (base) situation. Since the EIS references the fact that newer information exists (see page 5-32, "1997 Annual Update for 1997 contours"), it is unclear why at the very least 1997 was not used as the base/current year.

6.39

In addition, the EIS indicates that the noise model used 1990 Census Tiger Files to predict the populations levels in the noise contours for the 1993 noise contours. We recommend that the document provide appropriate justification that 1990 population data is appropriate for use in

6.40

1993 without the use of any adjustment. It is also not clear what census data was used for modeling 1999 and 2010 years.

2. **Use of 1999 as Operational Year:** The use of 1999 as the runway operational year is not appropriate since the new runway will not be operational this year. Therefore, we recommend that FAA provide additional new runway operational year modeling.

6.41

3. **Noise Contour Maps:** Various maps in the noise analysis need to be supplemented. Specifically:

- While the "satellite view" contour maps are useful, there is a need for contour maps that have far greater detail. The contour maps in appendix L are better, but even those are not of the scale that we expect to see in FAA NEPA documents. It is likely that these maps will need to be of the fold out variety in order to show the appropriate scale;
- Detailed land use maps in color with noise contour overlays should also be provided. The actual land use as it relates to local zoning should be discussed in the appropriate sections of the document. These maps should be of the same scale as the as the new contour map requested above;
- To enhance the discussion related to reduction of the 70 and 75 dBA contour areas and the slight increase the 65 dBA contour, we recommend supplemental maps be provided (with possible use of color) that clearly highlight where these changes occur.

6.42

4. **Airport Layout Map:** Since the basic FAA action is the approval of the modified Airport Layout Plan, the document should contain a copy of both the existing and proposed Airport Layout Plan (an appropriate scale will probably require the use of a fold out maps).

6.43

5. **Greater Detail in Operation and Fleet Mix Information:** Detailed operation and fleet mix tables need to be provided for all modeled years. These tables should show: aircraft type, average daily operations, arrivals day, arrivals night, departure day and departure night. These data should match the input data used in the INN. The new tables should be sub-classed by commercial, commuter/air taxi, military and general aviation operations.

6.44

6. **Discussion of 60 dBA Contours:** Although the 60 dBA contours in the technical appendices do provide additional information, this information should be provided in the main volume of the EIS. We recommend that FAA show and discuss any areas within the 60 dBA contour that would experience a 3 dBA increase in accordance with the 1992 FICON guidance.

6.45

7. **Detailed Grid Point SEL Data:** While the noise analysis does provide some Lmax data, we recommend that this information be supplemented with detailed grid point SEL data for selected representative sites.

6.46

Construction Mitigation

The DEIS identifies several construction period mitigation measures, including the suppression of fugitive dust. Massport should commit to mitigative measures to control emissions from the heavy-duty engine construction equipment involved in any airport improvements. An excellent model for such mitigation is the Central Artery/Tunnel's Clean Air Construction project, a project spearheaded jointly by EPA-New England, several Massachusetts state offices, the Northeast States for Coordinated Air Use Management (NESCAUM) and the Manufacturers of Emission Control Association. Under the Clean Air Construction project, seventy construction machines (including front end loaders, backhoes, excavators, cranes and air compressors) have been retrofitted with pollution control devices (oxidation catalysts or particulate filters) in order to reduce particulate matter, hydrocarbons, carbon monoxide and toxics. In its construction contracts, Massport should require contractors to participate in this program of retrofitting construction equipment. More information on this construction initiative can be found at NESCAUM's website www.nescaum.org.

6.47

Rating

For the reasons discussed above, EPA has rated this EIS "Environmental Objections; Insufficient Information" in accordance with EPA's national rating system, a description of which is attached.

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes that draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Letter 6

US Environmental Protection Agency, Region 1

John P. DeVillars, Regional Administrator

Code	Topic 1	Topic 2	Comment	Response
6.1	Noise	Soundproofing	...while the DEIS promises as mitigation the soundproofing of all homes newly exposed to high levels of aircraft noise as a result of the proposed project, there remains uncertainty as to whether the mitigation covers enough homes, and whether Massport and FAA will have adequate funding to carry out this commitment.	The mitigation program will include all residences impacted through implementation of the Preferred Alternative. Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country that received FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999-2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.
6.2	Ground Transportation	Mitigation	...commitments for improvements to the Blue Line Station at Logan...have not been kept.	The MBTA is developing a new Logan Airport Station to be located about 400 feet north of the existing Logan Airport Station. Massport is consulting with the MBTA on the project's design and operational elements. The new Logan Airport Station will include modern passenger amenities such as wide escalators, oversized elevators, and real-time flight information displays in the station lobby. It will also provide a convenient at-grade connection to the neighborhood, AITC Blue Route and Logan Airport, and may become a stop on the MBTA's proposed Circumferential Transit (Urban Ring) service. The Airport Station project has been the subject of EIS review and is proceeding as approved in the FHWA-CA/T review process.

Code	Topic 1	Topic 2	Comment	Response
6.3	Environmental Justice	Demographic Data	The analytic basis for...[FAA's and Massport's conclusion that minority and low-income communities do not experience disproportionately high impacts] is insufficient since critical demographic and other relevant health data are missing.	<p>The Supplemental DEIS/FEIR provides detailed analysis of environmental justice requirements. Refer to Section 6.8 of the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population in the 65 dB DNL and above contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation.</p>
6.4	Environmental Justice	Demographic Data	...the DEIS does not compare the demographics of communities served by this project to the demographics of communities bearing the burden of the project's impacts.	<p>Refer to Section 6.8 of the Supplemental DEIS/FEIR for a detailed discussion of the Environmental Justice analysis. The analysis provides for an appropriate comparison of the alternatives.</p> <p>The analysis covers all the requirements of Executive Order 12898, U.S. DOT implementing regulations, and FAA policy.</p> <p>The Environmental Justice analyzes the demographics of those that bear the impact within the 65 DNL contour to the population that gets the benefit of the project, which is Suffolk County.</p>
6.5	Environmental Justice	Impacts	...the environmental justice analysis in the DEIS focuses solely on noise and ignore credible public comments identifying air quality, odor, traffic and other impacts that cumulatively burden surrounding communities with high percentage of low-income and minority populations.	Noise was identified as the only off-airport impact associated with the Preferred Alternative with the potential for impacts to environmental justice populations. Because of improved airfield efficiency and shorter delay periods, the Preferred Alternative is projected to slightly reduce emissions of air pollutants when compared to the No Action Alternative. Construction will be managed to minimize air, noise and other impacts to the adjacent communities. All construction vehicles will be required to use designated truck routes and to avoid local streets. Because of the perceived importance of cumulative impacts, Chapter 7 of the Supplemental DEIS/FEIR addresses cumulative impacts.

Code	Topic 1	Topic 2	Comment	Response
6.6	Regional Transportation	Regional Airports	...[T]o increase alternatives to air travel through Logan...[a regional, long-term transportation goal should be to use] T.F. Green in Rhode Island, Worcester Airport in Massachusetts, Manchester Airport in New Hampshire and other regional airports....	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. In addition, FAA AIP funds have been provided since the early 1990s to initiate development of these regional airports. Massport has actively encouraged the development of regional airports and full use of other regional alternatives, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a description of the upcoming New England Airports System Study.
6.7	Regional Transportation	Passenger Rail	[Another regional, long-term transportation goal should be to provide] through intercity high-speed rail connections supported by a North-South Station link.	Massport has actively encouraged regional transportation alternatives to Logan Airport, including rail. Massport supports intercity rail planning through its membership in the Boston Metropolitan Planning Organization (MPO). The MPO is a cooperative planning board whose membership also includes MassHighway, Metropolitan Area Planning Council; MBTA, and MBTA Advisory Board. As members of the MPO, Massport and these agencies are responsible for preparing the <i>Boston Transportation Improvement Program (TIP)</i> and the <i>Transportation Plan for the Boston Region</i> . In this capacity, Massport influences regional transportation plans for intercity rail. Massport also holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic.
6.8	Ground Transportation	Regional Airports	[Massport, FAA, and other federal and state transportation agencies should] establish efficient mass transit access to and between the regional airports....	Massport supports improved ground access to Worcester Regional, T.F. Green/Providence, Manchester and Logan airports. These projects are discussed in Section 2.9 of the Supplemental DEIS/FEIR.
6.9	Ground Transportation	Access to Logan Airport	[Massport, FAA, and other federal and state transportation agencies should] reduce Logan's traffic impacts on surrounding communities by such measures as a free shuttle service between South Station and Logan, an intermodal terminal at Route 128, and the Urban Ring.	Massport has a comprehensive ground access strategy in place including consideration of promoting HOV use and alternative modes of transportation to Logan Airport. The status of the South Station and Logan Airport link (the Airport Intermodal Transit Connector), an intermodal terminal at Route 128, and the Urban Ring were documented in the <i>Logan Airport 1999 ESPP</i> (previously GEIR).

Code	Topic 1	Topic 2	Comment	Response
6.10	Alternatives	Peak Period Pricing	In addition, Massport should reduce the small plane mix from Logan's peak traffic hours through a peak period pricing strategy, implemented with appropriate sensitivity to the needs of communities served exclusively by smaller aircraft.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
6.11	Alternatives	Peak Period Pricing	Additional analysis is critical to determine whether the imposition of peak period pricing now would help send the necessary market signals to ensure that airlines' plans result in the most efficient use of Logan Airport (including smarter use of other regional airports, and, for smaller carriers, the use of planes capable of handling more passengers.	Elements of the PPP monitoring system include periodic review of advance airline schedules, comparisons of projected activity levels to airfield capacity, analysis of resultant levels of delay, discussions with major Logan Airport carriers to allow for voluntary schedule adjustments, and development of an action plan, as described in Section 4.5 of the Supplemental DEIS/FEIR, which would be put into place if overscheduling conditions are not corrected. Results of the monitoring system were reported in filings on an ongoing basis. The Peak Period Monitoring System is described in Section 4.5.4 of the Supplemental DEIS/FEIR.
6.12	Noise	Soundproofing	The affected communities have raised serious and credible concerns about the ability of the computer modeling relied upon in the DEIS to accurately reflect noise levels associated with Logan operations and to select homes eligible for soundproofing. These concerns are based on <i>in situ</i> noise monitoring which appears to demonstrate that computer modeling underestimates actual noise levels, at least in some neighborhoods. The DEIS does not properly address this deficiency and thus does not adequately represent the likely actual noise impacts.	<p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>).</p> <p>In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model.</p> <p>At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 5 of the <i>Logan Airport 1998 Annual Update</i>). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Using results from a special study of Terrain Modeling analysis ("hill effects") in Orient Heights and Jeffries Point, Massport applied for and received approval to apply a correction to 1999 contours to account for increased levels in Orient Heights.</p>
6.13	Noise	Impacts	Furthermore, the noise increases to neighborhoods that fall outside the FAA's 65-dBA contour remain inadequately acknowledged and addressed, as do the very high noise levels that occur each time aircraft fly over or by neighborhoods.	Noise exposure is now reported down to DNL values of 60 dB, and expected changes in exposure are reported for several new communities outside the 60 dB DNL contour. For example, refer to Tables 6.2-8 and 6.2-9 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
6.14	Noise	Impacts	The DEIS does not fully disclose the sleep disruption and other impacts that occur in these instances, nor does it address cumulative noise impacts to account for all noise, not just modeled aircraft noise, as is required under NEPA.	<p>The Night Equivalent Sound Level (LeqN) was calculated at 23 selected locations for all fleets and scenarios. Tables 6.2.17 and 6.2.18 of the Supplemental DEIS/FEIR report these data for the 29M Low and 37.5M High Fleet scenarios of the Supplemental DEIS/FEIR. The results show that, at most locations, the LeqN for the future fleets is lower than for the 1993 case. Where there is an increase in LeqN, the reason was the increase in flights for the No Action Alternative, which generally was mitigated by the Preferred Alternative. These results indicate that there will be less sleep disturbance in the future than that currently experienced.</p> <p>Refer to Section 7.4.1 of the Supplemental DEIS/FEIR for a discussion of cumulative noise impacts.</p>
6.15	Analysis Assumptions/ Methodologies	Base Year	In addition, the use of 1993 is not appropriate as the base year for analysis as it does not represent existing conditions and may minimize the relative noise impacts from the Preferred Alternative when compared with what appears to have been an especially noisy base year.	The Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. The No Action Alternative is the appropriate "base" comparison for assessing future year conditions and the effectiveness of the Airside Project. The Supplemental DEIS/FEIR expands upon the discussion between current and historical conditions and can be found in Section 4.2 of the Supplemental DEIS/FEIR.
6.16	Analysis Assumptions/ Methodologies	Passenger Forecasts	The DEIS analyses ignore the critical question of whether the improvements will spur additional growth at the airport. In comparing the alternatives, both the noise and air quality analyses assume that the future passenger/flight operations growth at Logan will remain constant regardless of whether or not the runway 14/32 is constructed. The analysis thereby avoids any serious consideration of what appears to be one of the most critical questions posed by this project—whether the proposed improvements, especially when combined with landside improvements, cumulatively facilitate future growth in flight operations and passenger traffic with corresponding increases in noise, traffic, and air pollution impacts.	<p>The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway.</p> <p>Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Logan Airport Airside analysis and GEIR/ESPRs. Section 4.2 of the Supplemental DEIS/FEIR includes more detailed discussion.</p>

Code	Topic 1	Topic 2	Comment	Response
6.17	Regional Transportation	Regional Airports	<p>...the scope of the DEIS, with its focus on construction of proposed runway 14/32 and the taxiway improvements, is too limited and fails to seriously consider regional improvements as alternatives to the Logan runway project. As EPA indicated in its previous comments, the DEIS should have identified a targeted regional strategy including both existing and potential capacity, as well as regional pricing and marketing to enhance the capacity and efficiency of, and access to, all New England airports.</p>	<p>The alternatives in the Supplemental DEIS/FEIR respond to state and Federal scoping directives. Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Massport now expects that Logan Airport will not achieve the 37.5 million passenger forecasts until 2015, rather than 2010, and the 45 million passenger forecasts will not be achieved until 2024. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.</p>
6.18	Environmental Review Process	FAA/NEPA, MEPA	<p>As EPA indicated in comments on the DEIS scope, the airside and landside projects are functionally linked, and as such, they should be evaluated together in a comprehensive EIS. The current analysis focuses entirely in airside issues with no real analysis of opportunities for Massport to integrate landside and airside planning to enable Logan to improve operations and handle the substantially greater numbers of passenger anticipated for the coming decades. In response to our scoping comments, the DEIS explains that the analysis is based on background planning information provided in the state Genenc Environmental Impact Report (GEIR) and that the DEIS is based on the FAA scope which was developed through a public comment process. Unfortunately, our comments on the appropriate scope of analysis for the EIS were largely discounted, and the GEIR, a document prepared under the rules of state law, does not meet the requirements of NEPA. Thus, reliance on the GEIR to satisfy NEPA's requirements for a cumulative impact analysis is not appropriate.</p>	<p>The proposed improvements analyzed in the Supplemental DEIS/FEIR involve both construction and administrative actions that will facilitate aircraft operations (landings, takeoffs and taxiing). None of the improvements involve landside facility improvements (e.g., terminals and roadways) or related operations. The Supplemental DEIS/FEIR analyzes in detail the impacts from aircraft operations, including analysis of noise and air quality impacts during the years 1993, 1998 and under future forecast scenarios as well as environmental benefits from certain of the improvement concepts under review. In this respect, the Supplemental DEIS/FEIR conforms with scoping directives from the lead federal agency (the FAA) and with applicable FAA environmental orders, all issued in accordance with NEPA, and with directives from EOEI issued under MEPA. The various GEIR documents, including the <i>Logan Airport 1998 Annual Update</i> and the <i>1999 Environmental Status and Progress Report</i> (previously GEIR), provide additional analytic context by examining cumulative impacts from airside (i.e., aircraft) operations and landside (e.g., vehicular traffic, terminal service vehicles) operations at Logan Airport as well as Massport's comprehensive mitigation program. The ESPR/GEIR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR as a background document. Each GEIR/ESPR submission is subject to public review and comment. The <i>Logan Airport 1998 Annual Update</i> and the <i>1999 ESPR</i> analysis is based on the same forecast levels used in the Supplemental DEIS/FEIR. The GEIR/ESPR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Supplemental DEIS/FEIR. Consistent with past practice, Massport expects that the FAA will take the GEIR/ESPR analysis into account during its deliberations and ultimate decision on the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
6.19	Ground Transportation	Access to Logan	EPA recommends that, rather than proceeding with the environmental review of the taxiway and runway improvements, Massport and FAA focus instead on establishing a strategy to make Logan Airport a more efficient transportation center with less impact on surrounding communities, by improving mass transit access to the Airport and preventing growth in the number of flight operations.	Massport is constantly striving to make Logan Airport a more efficient airport with less impact on surrounding communities. These efforts include improving mass transit access to Logan Airport. The Airside Project makes Logan Airport more efficient and will not affect vehicle traffic, transit systems or major roadway intersections. The Supplemental DEIS/FEIR discusses all the environmental impacts from the Airside Project. The ESPR/GEIR and its Annual Updates discuss Massport's efforts to lessen Logan Airport's total environmental footprint, especially impacts from ground access. However, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
6.20	Regional Transportation	Passenger Rail	One means to reduce the growth pressures on Logan Airport is to enhance the current intercity transportation options...Massport, in cooperation with EOTC, U.S. DOT, Amtrak, and other transportation agencies, should take active measures to promote high speed rail....	Chapter 2 of the Supplemental DEIS/FEIR provides discussion of the entire region's air transportation system and includes a discussion of alternative modes, specifically, high-speed rail and the extent of Massport's active involvement in this area. Refer to response to Comments 6.6 and 6.7.
6.21	Regional Transportation	Regional Airports	These efforts should not be limited to high speed rail but should also encourage and market the use of other regional airports to the benefit of Logan and surrounding communities.	Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional alternatives, and steps Massport has taken to foster increased use of these alternatives. Refer to response to Comments 6.6 and 6.7.
6.22	Alternatives	Peak Period Pricing	...the implementation of peak period pricing should be a piece of the regional transportation strategy. The DEIS clearly demonstrates that peak period pricing would serve to lessen delays substantially in the high growth future scenarios... Additional analysis is critical to determine whether the imposition of peak period pricing now would help send the necessary market signals to ensure that airlines' plans result in the most efficient use of Logan Airport...Such an evaluation should include an appropriate sensitivity analysis to help determine the operations/hour level where peak period pricing becomes effective.	Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport. Refer to responses to Comment 6.10 and 6.11.
6.23	Alternatives	Peak Period Pricing	According to the DEIS, Massport appears willing to consider peak period pricing only when Logan actually experiences over scheduling. For this measure, Massport is prepared to wait and see if peak period pricing is necessary. On the other hand, the DEIS details Massport's argument that it needs a new runway now, despite the exponential growth in passenger traffic through Green and Manchester. Following such logic, EPA questions why Massport doesn't wait on its decision to construct a new runway until it is clear whether the region really needs an expanded Logan, thereby giving the regional airports a chance to capture more traffic, consistent with the impressive gains made at Manchester and Green.	Additional analysis of PPP is set out in Section 4.5 the Supplemental DEIS/FEIR The regional airports at Manchester and T.F. Green/Providence have experienced exceptional traffic growth over the past several years. Massport estimates that in 1999 regional airports diverted 2.4 million passengers from Logan Airport. In the future, continued development at the regional airports should relieve some of the traffic growth pressures at Logan Airport, resulting in a reduced rate of traffic growth. Nevertheless, regional alternatives do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Refer to response to Comment 6.17.
6.24	Alternatives	Other Non-Construction Alternatives	Additional delay reduction benefits may be obtained from managing/prioritizing takeoffs so the large planes with more passengers are given preference over smaller planes during peak periods of delay.	Although prioritizing takeoffs based on aircraft size might reduce delays, the air traffic control system of the United States, which the FAA operates, is based on a first-come, first-serve policy under most circumstances. Any change in this policy would require a major federal decision and would involve significant implications within the entire air traffic control system.

Code	Topic 1	Topic 2	Comment	Response
6.25	Analysis Assumptions/ Methodologies	Planning Period	...the proposed project offers only short term relief (five years) for delay problems it is intended to resolve. Massport should extend the planning horizon for the analysis (currently only at ten years) as part of supplemental efforts to investigate longer term solutions. The solutions should actively integrate Logan operations with regional transportation planning (airside and landside integration).	The airside analysis demonstrates that the delay reduction benefits of proposed Runway 14/32 and the other recommended airside improvements increase in the future, from 43,000 annual hours of delay reduction under the 29 M Low Fleet scenario up to 78,000 hours under the 37.5 M passenger Low Fleet scenario. Delay and environmental impacts of the Airside Project were evaluated under a broad range of future operating conditions at Logan Airport. Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport may not reach 29 million passengers, presented in the Airside Project Draft EIS/EIR as a "1999" projection, until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport is expected to reach 37.5 million passengers in 2015 rather than 2010, and the 45 million passenger forecasts will not be achieved until 2024. Thus, the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Chapter 2 of the Supplemental DEIS/FEIR addresses the integration of the Airside Project and regional transportation.
6.26	Air Quality	Model	The DEIS's conclusion that the Preferred Alternative will have the least negative air quality impacts is a result of certain questionable assumptions. The air quality analysis assumes that the airport-related motor vehicle emissions and the number of flight operations will be identical for all the alternatives. Unfortunately, these assumptions underlying the air quality analysis ignore the possibility that certain alternatives may result in more passengers or more flight operations. Without an analysis of whether an additional runway will affect future growth of flight operations, the validity of the air quality conclusions...are questionable. The DEIS should have analyzed whether increased airside efficiency affects the number of flight operations in the future. If the answer is yes, the air quality analysis should be structured in a way to discern the true comparative impacts of each alternative.	Refer to first paragraph in response to Comment 6.16. The air quality analysis was based on facts, findings, and assumptions that best characterize operational conditions at Logan Airport under future alternative growth and development scenarios. The basis for these scenarios and corresponding conditions is presented in Section 5.4 of the Supplemental DEIS/FEIR.
6.27	Air Quality	NAAQS	Table 5.3-1 reflects the current NAAQS for criteria pollutants. However, the table contains the incorrect 24-hour NAAQS for fine particulate matter. Rather than 50 ug/m, the standard is 65 ug/m.	Table 5.4-2 of the Supplemental DEIS/FEIR has been corrected to indicate that the 24 hour standard for fine particulate matter is 65 micrograms per cubic meter.
6.28	Air Quality	NAAQS	In Section 5.3.1.2 (page 5-41 and 42), the Draft EIS/R reflects ambient levels of criteria air pollutants measured at the three closest Massachusetts DEP monitoring stations. These levels are reflected in Table 5.3-2. The Draft EIS/R compares these ambient levels with the one-hour ground-level ozone standard of 0.12 parts per million (ppm). In July 1997, EPA revised its ozone standard to an eight-hour standard of 0.08 ppm. The DEIS should use this more stringent standard as the point of comparison.	During the time that the analysis was conducted for the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR no definitive standard was in affect because of court challenges. The one-hour standard was applied in the Airside Project Draft EIS/EIR analysis. The available monitoring data for ozone eight-hour averages are now included in Section 5.4 of the Supplemental DEIS/FEIR. The eight-hour data are unavailable for years before 1995.

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6.29	Environmental Justice	Demographic Data	...the DEIS does not satisfy either the intent or the specific directives of the federal government's environmental justice policy as expressed in the Executive Order, the DOT Order, and the CEQ Guidance. Despite CEQs statement that its guidance should be applied with flexibility, the DEIS uses extremely narrow definitions of low-income and minority populations. Use of such narrow definitions allows the FAA to conclude that there are no environmental justice issues because so few people fall within the narrowly defined categories.	Low income and minority populations were defined in accordance with Federal Executive Order 12898, the United States DOT Final Order, the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively.
6.30	Environmental Justice	Demographic Data	The DEIS presents no detailed demographic data for the communities surrounding Logan Airport nor does it identify the impacted community with any geographic precision. The impacted community is only identified by noise contours presented on a very small-scale map. There is no map clearly indicating the location of the study area.	Refer to new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
6.31	Environmental Justice	Demographic Data	Although required by the DOT Final Order, the DEIS does not define the populations served or affected by race, color, national origin, and income level. Table 8.7-1 is the only table presented in the environmental justice analysis. That table does not clearly indicate where the noise-exposed population is located, nor does it provide any detail in describing the demographics of that population. It is impossible for any individual citizen to tell from the table whether he or she is in the noise-exposed population. In addition, none of the information is mapped so that the public can see the distribution of health and environmental impacts across population groups.	The estimated population within the 65 dB and 60 dB DNL noise contours for the No Action and Preferred Alternatives is presented for each of the communities within the study area in Tables 6.8-6 through 6.8-10 of the Supplemental DEIS/FEIR. Figures 6.8.1 and 6.8.2 of the Supplemental DEIS/FEIR provide information on the distribution of median household income and minority populations within the study area. Refer to new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
6.32	Environmental Justice	Impacts	...DEIS presents little data and analysis on a broad range of potential adverse impacts. Because the environmental justice analysis in the report is brief and provides little basis for its conclusion that noise is the only adverse impact, especially in the context of cumulative impacts, it is impossible to review the rationale or data used in reaching that conclusion. Ironically, that is just the circumstance that federal environmental justice policy is intended to remedy.	The Supplemental DEIS/FEIR contains an expanded analysis of Environmental Justice considerations. Noise was identified as the only off-airport impact from the Preferred Alternative with the potential for environmental justice impacts. The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. However, because the area added to the 65 dB DNL contour is primarily within the City of Chelsea, other environmental and health issues were also considered in an effort to assess other cumulative or multiple adverse exposures. Refer to Section 6.8.6 of the Supplemental DEIS/FEIR for additional information.
6.33	Environmental Justice	Impacts	The CEQ Guidance directs agencies to consider the potential for multiple or cumulative exposure to health and environmental hazards even if the effects of the cumulative exposure are not within the control of the agency action. The DEIS offers no information regarding the health of the communities surrounding Logan. EPA understands that, for purposes of determining eligibility of homes for soundproofing, FAA may only rely on noise, generated by aircraft operations. However, in preparing the environmental justice portion of the DEIS, the cumulative noise impacts from all sources in affected neighborhoods is a critical consideration.	The Environmental Justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. The analysis showed some increase in population within the 65 dB contours primarily in the City of Chelsea if the Preferred Alternative is implemented. Environmental and health issues within the City of Chelsea were considered in an effort to assess other cumulative or multiple adverse exposures. Refer to Section 6.8.6 of the Supplemental DEIS/FEIR for additional information. Available public health studies for Boston, Winthrop and Revere were also reviewed and are presented in Section 6.8.7 of the Supplemental DEIS/FEIR.

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6.34	Environmental Justice	Impacts	...there is no discussion of the public health issues often raised by minority and low-income communities, such as asthma, respiratory distress, or attention deficit disorder. Most remarkably, there is no discussion of hearing loss, an obvious health concern to any population exposed to excessive noise. Without any discussion of baseline health conditions, it is impossible to evaluate the incremental impacts or risk associated with the proposed agency action.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
6.35	Environmental Justice	Impacts	...there is no discussion of interrelated social, cultural, occupational, historical, and economic factors that may increase the environmental effects of the proposed action. For example, the DEIS appears to assume that soundproofing completely addresses noise impacts in a neighborhood. There is no mention that over-flights impair residents' use of their porches or yards. Double-pane windows cannot protect the conversations on the street and front stoop that bind a community together.	Environmental and health studies relating to the City of Chelsea were reviewed to assess the potential for other cumulative or multiple adverse exposures, since the increase in population within the 65 dB DNL contour associated with the Preferred Alternative is primarily within this community. While it is true that sound insulation does not alleviate noise exposure outside, it is an effective technique that has been implemented effectively, not only at Logan Airport, but also at numerous other airports throughout the United States.
6.36	Environmental Review Process	Public Participation	Rather than responding directly to community concerns, the FAA instead often focuses on its compliance with process requirements...several community groups and members of Logan's Citizens Advisory Council complained to EPA that Massport and FAA failed to respond to specific requests made from October 1997 to late 1998 to engage in a concrete discussion with the community about plans for air side improvements at Logan, and that when the consultation did resume, it was just before release of the DEIS.	There was an extensive public participation and review process during the preparation of the Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Draft EIS/EIR, the FAA held two public hearings. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.

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6.37	Alternatives	Runway 14/32	It remains unclear how Massport and the FAA will be able to comprehensively "guarantee" unidirectional use (over the harbor only) of Runway 14/32.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32. Refer to Section 8.5 of the Supplemental DEIS/FEIR for a discussion of enforcement of the unidirectional limitation.</p>
6.38	Noise	PRAS	...based on the recent public debate concerning PRAS goals, it is not evident that these goals reflect current community interests...the focus on PRAS goals as a benefit of the proposed runway inappropriately shifts the focus away from consideration of alternatives to reduce use of Logan (or air travel for that matter) as a means to eliminate delay. Asserting that the FAA will be able to distribute noise impacts more flexibly across impacted communities does nothing to address the question of whether those noise impacts are necessary or adequately mitigated.	<p>The Supplemental DEIS/FEIR demonstrates that there have been no significant demographic changes to warrant an update of the PRAS goals. Massport does not have control of air travel demand, and continued economic prosperity will inevitably produce more demand for air travel. The Preferred Alternative mitigation program includes several new elements, including sound insulation, an expanded PRAS monitoring and reporting system, and implementation of an expanded PPP monitoring system. Construction of Runway 14/32 would allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities.</p> <p>Furthermore, the Supplemental DEIS/FEIR also demonstrates the more equitable balance of noise impacts among communities surrounding Logan Airport that can be achieved with the Preferred Alternative as opposed to the imbalance that occurs today and would occur in the future if no action is taken.</p>

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6.39	Analysis Assumptions/ Methodologies	Base Year	The use of 1993 as the base year is not appropriate. While it may be true that the 1993 noise impacts were a "worst case" due to the large number of Stage 2 aircraft, we do not believe that it represents the current situation. Moreover, the comparison of the alternatives with a particularly high noise year may serve to minimize what might otherwise be significant changes from the current 1999 level of noise experienced by nearby community residents. Since the EIS references the fact that newer information exists (see page 5-32, "1997 Annual Update for 1997 contours"), it is unclear why at the very least 1997 was not used as the base/current year.	Refer to response to Comment 6.15.
6.40	Analysis Assumptions/ Methodologies	Base Year	...the EIS indicates that the noise model used 1990 Census Tiger Files to predict the populations levels in the noise contours for the 1993 noise contours. We recommend that the document provide appropriate justification that 1990 population data is appropriate for use in 1993 without the use of any adjustment. It is also not clear what census data was used for modeling 1999 and 2010 years.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR used 1990 federal census data at the "block" level for all analysis years, which represents the most recent, detailed level of population data available. Estimates of 1995 population for the municipalities adjacent to Logan Airport, developed by the Massachusetts Institute for Social Research, indicate that the population is relatively stable. The 1995 population estimates are not available at a block group level. Refer to Section 6.8.3 of the Supplemental DEIS/FEIR for additional discussion.
6.41	Analysis Assumptions/ Methodologies	Base Year	The use of 1999 as the runway operational year is not appropriate since the new runway will not be operational this year. Therefore, we recommend that FAA provide additional new runway operational year modeling.	Massport and the FAA examined a wide range of future forecast levels in the Airside Project analysis. Logan Airport's rate of growth has slowed partially because of the emerging role of the alternative airports in serving the region's air travel demand. Logan Airport is not expected to reach the traffic level associated with the 29 million passenger scenario until 2003, about the time the runway will be operational. Thus, the runway operational analyses for the 29 million passenger scenario are valid.
6.42	Noise	Studies	Various maps in the noise analysis need to be supplemented. Specifically: While the "satellite view" contour maps are useful, there is a need for contour maps that have far greater detail. The contour maps in appendix L are better, but even those are not of the scale that we expect to see in FAA NEPA documents. It is likely that these maps will need to be of the fold out variety in order to show the appropriate scale; Detailed land use maps in color with noise contour overlays should also be provided. The actual land use as it relates to local zoning should be discussed in the appropriate sections of the document. These maps should be of the same scale as the new contour map requested...To enhance the discussion related to reduction of the 70 and 75 dBA contour areas and the slight increase the 65 dBA contour, we recommend supplemental maps be provided (with possible use of color) that clearly highlight where these changes occur.	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
6.43	Environmental Review Process	FAA/NEPA	Since the basic FAA action is the approval of the modified Airport Layout Plan, the document should contain a copy of both the existing and proposed Airport Layout Plan. ...	Figures 3.1-1 and 3.1-2 of the Supplemental DEIS/FEIR show the existing and proposed airside features. The cover of the Airside Project Draft EIS/EIR also presents the existing and proposed layout. Modifications to the Airport Layout Plan are effective upon FAA approval.
6.44	Noise	Model	Detailed operation and fleet mix tables need to be provided for all modeled years. These tables should show: aircraft type, average daily operations, arrivals day, arrivals night, departure day and departure night. These data should match the input data used in the INM. The new tables should be sub-classed by commercial, commuter/air taxi, military and general aviation operations.	Detailed data on each of the fleet mixes that were under consideration may be found in Volume 3, Appendices E and H of the DEIS/EIR. Additional tables in Appendix E of the Supplemental DEIS/FEIR provide data on operations and runway usage used in the analyses of the High Regional Jet Fleet.

Code	Topic 1	Topic 2	Comment	Response
6.45	Noise	Impacts	Although the 60 dBA contours in the technical appendices do provide additional information, this information should be provided in the main volume of the EIS. We recommend that FAA show and discuss any areas within the 60 dBA contour that would experience a 3 dBA increase in accordance with the 1992 FICON guidance.	Refer to Section 6.2.3 and Tables 6.2-6 through 6.2-10 of the Supplemental DEIS/FEIR.
6.46	Noise	Impacts	While the noise analysis does provide some L _{max} data, we recommend that this information be supplemented with detailed grid point SEL data for selected representative sites.	SEL and L _{max} are both indicators of noise from a single event and are directly correlated with each other, SELs being approximately 10 dB higher in value for a given aircraft overflight. This is because the SEL is integrated over time while L _{max} is an instantaneous sound level. Because of this relationship, tabulating SELs provides no additional information with which to compare alternatives. For example, in Table 6.2-18 in the Draft EIS/EIR, the first line of data reported for Site 1 on Andrews Street in South Boston shows no difference between Alternatives 1 and 1A, regardless which fleet is considered. SELs would also show no difference. At Site 3, where the L _{max} decreases between Alternatives 1 and 1A, a comparable table of SELs would show a decrease of almost identical magnitude. As the Airside Project Draft EIS/EIR indicates, "these L _{max} [or SEL] values are not as useful for assessing the relative noise among various locations and fleets as are the cumulative metrics such as DNL because they represent extreme values...and they do not consider how often the noise events occur."
6.47	Construction	Mitigation	Massport should commit to mitigative measures to control emissions from the heavy-duty engine construction equipment involved in any airport improvements. In its construction contracts, Massport should require contractors to participate in this program of retrofitting construction equipment.	Massport will require contractors to retrofit their heavy construction equipment with advanced pollution control devices in accordance with DEP's Clean Air Construction Initiative. Contractor owned equipment, such as front-end loaders, backhoes, cranes and excavators, will be retrofitted with oxidation catalysts to filter and break down hydrocarbons, particulate matter and carbon dioxide from diesel emissions. Refer to Section 6.9 and Chapter 8 of the Supplemental DEIS/FEIR for additional discussion of air quality mitigation measures during the construction period.

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Liaison Outreach & Services Program

Federal Regions I & II



HISPANIC-AMERICAN
CHAMBER OF COMMERCE

67 Broad Street
Boston, Massachusetts 02109
Tel: 617.261.HACC/4222
Fax: 617.261.6333
(888) 775.LOSP/5677
103342.1733@compuServe.com

U.S. Department of
Transportation

Office of Small and
Disadvantaged
Business Utilization
Washington, D.C.

LETTER 7

Friday, April 16, 1999

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Mr. Arthur Pugsley-EOEA No. 10458
Secretary of Environmental Affairs
Attention MEPA Office
100 Cambridge Street
Boston MA 02205

Dear Mr. Pugsley:

The Hispanic-American Chamber of Commerce, an organization of businesses, individuals, and institutions active in the Spanish and Portuguese speaking markets in the Northeast United States and abroad, supports the Logan Modernization Project and a greater emphasis on regional alternatives for upgrading our transportation infrastructure, including high speed rail and upgrading of the Worcester airport.

7.1

Our organization conducts outreach and information activities on behalf of nearly 10,000 small and disadvantaged businesses in New England which stand to benefit from the above initiatives as potential contractors to transportation agencies.

In addition, we are advocates for the Hispanic community which comprises much of the population around Logan Airport and which stands to benefit directly in terms of jobs and economical transportation from modernization of the airport.

Cordially,

Bruce Young Candelaria
Executive Director/
LOSP Director, Regions I & II

Letter 7

US Department of Transportation, Liaison Outreach & Services Program Bruce Young Candelaria

Code	Topic 1	Topic 2	Comment	Response
7.1	Regional Transportation	Regional Airports	The Hispanic-American Chamber of Commerce, an organization of businesses, individuals, and institutions active in the Spanish and Portuguese speaking markets in the Northeast United States and abroad, supports the Logan Modernization Project and a greater emphasis on regional alternatives for upgrading our transportation infrastructure, including high speed rail and upgrading of the Worcester airport. The Hispanic community comprises much of the population around Logan Airport and which stands to benefit directly in terms of jobs and economical transportation from modernization of the airport.	Section 1.3 of the Supplemental DEIS/FEIR discusses the importance of Logan Airport to the regional economy.

Date: 4/22/99 1:53 PM
Priority: Normal
TO: Danielle Rinsler, Flavio Leo
Subject: EOE 10458 Logan Airside Improvements

LETTER 8

Executive Office of Environmental Affairs
Attention: MEPA
Mr. Arthur Pugsley
EOEA 10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

I have provided verbal testimony to you earlier in my capacity as Executive Director of the Massachusetts Aeronautics Commission, as did our Chairman, Sherman W. "Whip" Saltmarsh, Jr. I also cosigned the letter from the six state aviation directors to MEPA supporting the airside improvements to Logan International Airport and opposing peak period pricing. On this, the final day of the comment period, I wanted to share two other comments with you.

First, in your review of the EIS/EIR, I respectfully recommend that you do so with an eye toward all of the previous planning and environmental analyses that precede this EIS/EIR including, but not limited to, the Second Major Airport Study, the Strategic Assessment Report, the New England Regional Air Service Study, Logan's GEIR. In many ways, this EIS/EIR represents the next logical process in that long chain of credible planning and environmental analyses.

8.1

Second, I would hope that Massachusetts Environmental Policy Act Unit and the Federal Aviation Administration will review the data before them in light of existing and applicable federal and state laws, regulations and policies. I have come to have a great respect for process. It would be a shame to divert attention to issues which are outside of the process at hand. For example, some would argue that certain procedures or methodologies were wrong or inaccurate and some even argue that MEPA and the FAA should adopt new procedures or methodologies. I submit that such discussion would be more appropriate in a process related to proposed rulemaking. I believe that Massport employed appropriate procedures and methodologies and the integrity of the process has been maintained.

8.2

Thank you for your time and consideration of these comments.

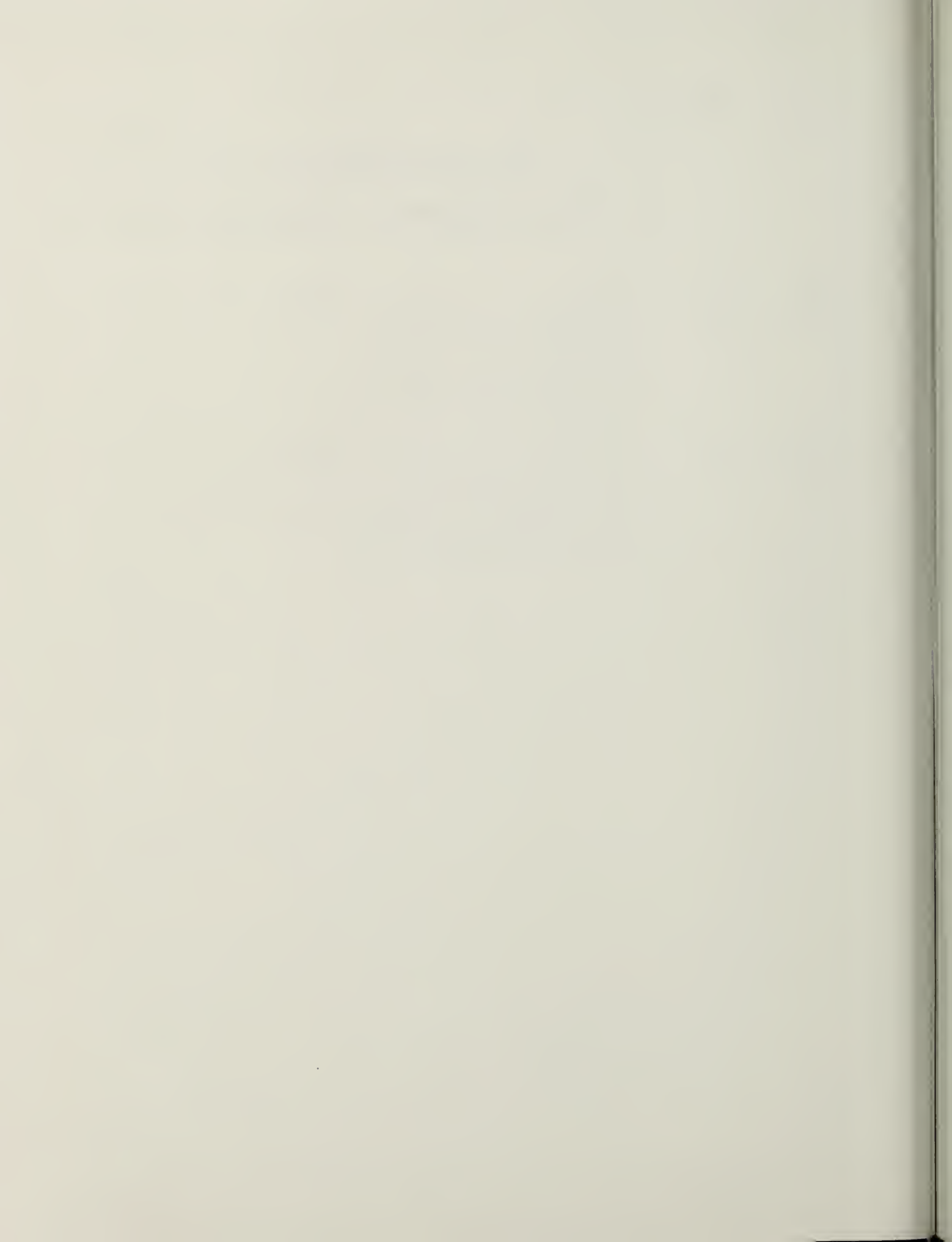
Sincerely,

Stephen R. Muench, Executive Director
Massachusetts Aeronautics Commission
Ten Park Plaza, Room 6620
Boston, MA 02116

Letter 8

MA Aeronautics Commission, Steve Muench, Executive Director

Code	Topic 1	Topic 2	Comment	Response
8.1	Regional Transportation	Regional Airports	... in your review of the EIS/EIR, I respectfully recommend that you do so with an eye toward all of the previous planning and environmental analyses that precede this EIS/EIR including, but not limited to, the Second Major Airport Study, the Strategic Assessment Report, the New England Regional Air Service Study, Logan's GEIR. In many ways, this EIS/EIR represents the next logical process in that long chain of credible planning and environmental analyses.	Comment noted.
8.2	Environmental Review Process	FAA/NEPA MEPA	I hope that [EOEA and FAA] will review the data before them in light of existing and applicable federal and state laws, regulations and policies. ... some would argue that certain procedures or methodologies were wrong or inaccurate and some even argue that MEPA and the FAA should adopt new procedures or methodologies. ... I believe that Massport employed appropriate procedures and methodologies and the integrity of the process has been maintained.	Comment noted.



EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Metropolitan Boston - Northeast Regional Office

ARGEO PAUL CELLUCCI
Governor

JANE SWIFT
Lieutenant Governor

LETTER 9

BOB DURAND
Secretary

EDWARD P. RUNC
Acting Commissioner

April 22, 1999

Executive Office of
Environmental Affairs
20th Floor
100 Cambridge Street
Boston, MA 02202

RE: Boston/Winthrop
Logan Airside Improvements
DEIR/EOEA #10458

Attn: MEPA Unit

Dear Secretary Durand:

The Department of Environmental Protection Northeast Regional Office has reviewed the Draft Environmental Impact Statement/ Report (DEIS/R) submitted by the Massachusetts Port Authority (Massport) for the identification and review of operational and environmental implications of alternatives for reducing current and projected levels of aircraft delay at Boston-Logan International Airport (EOEA #10458).

Air Quality:

Summary

The air quality analysis presented in the DEIS/R includes both an emissions inventory and dispersion modeling. The emissions inventory analysis compares the emissions burden of the alternatives and concludes that Alternative 1 will generate the least amount of carbon monoxide (CO), volatile organic compounds (VOC), oxides of nitrogen (NOx) and particulate matter (PM₁₀). The dispersion modeling results conclude that the highest predicted levels of CO, nitrogen dioxide (NO₂) and PM are below state and federal standards.

The DEIS/R makes the statement that "Air quality will improve due to

improved airfield efficiency and shorter delay periods attributable to each of the capital improvements." The project is being proposed by Massport to reduce aircraft delays and the associated costs of such delays during certain wind and weather conditions. Massport argues that the project is not designed to provide additional capacity for increased operations at Logan Airport. While DEP agrees that the project, and runway 14/32 in particular, will not be the primary factor that will draw additional air traffic to Logan, air travel and passenger demand is projected to increase dramatically. The air pollution impacts of this additional air traffic are substantial and merit the implementation of all feasible mitigation measures including, but not limited to, the strategies described below. 9.1

Massport's past and future commitments to mitigation measures through the environmental review process should be binding and a funding plan should be prepared to ensure their implementation. DEP recommends that Massport prepare and include this plan in the Final EIS/R. 9.2

Logan Airport Air Pollution Emissions Trends

Over the past several years, DEP has commented on the GEIR for Logan Airport that emissions trends for Logan Airport after 1999 are a large concern. In summary, long-term emissions projections indicate that NOx and CO emissions will increase in 1999 and in 2010 for total airport emissions. VOC emissions decreased from 1990-1997 due to a change in aircraft fleet mix and controls on motor vehicles, but have increased since 1997. The increases in emissions are directly attributable to increases in aircraft operations due to increased passenger demand. The majority of emissions are generated by aircraft operations and ground service equipment as illustrated by the following tables:

Total Airport Emissions (kg/day)			
Year	1997	1999	2010
VOC	3183	3269	3207
NOx	5726	6670	8343
CO	14640	14470	16686

Aircraft Emissions (kg/day)			
Year	1997	1999	2010
VOC	1959	1883	1490
NOx	4592	5365	6666
CO	6636	6096	9144

Ground Service Equipment (kg/day)			
Year	1997	1999	2010
VOC	530	536	786
NOx	622	693	934
CO	6098	6953	9144

Airport and aircraft emissions represent the largest uncontrolled source of air pollution nationwide and in Massachusetts. In fact, aircraft emissions are the only mobile source of air pollution in the Massachusetts State Implementation Plan (SIP) emissions inventory that have not been controlled or slated for near- or long-term emissions reductions. 9.3

DEP is particularly concerned about the projected increase in NOx emissions. For comparison purposes, airport NOx emissions are equivalent

to emissions from major stationary sources including power plants. For the 1999 summer ozone season (153 days from May 1st through September 30), total emissions from Logan Airport rank as the sixth largest source of NOx emissions when compared to the 37 sources regulated under 310 CMR 7.27, the NOx Allowance Program. In 2010, after implementation of further NOx reductions pursuant to EPA's NOx SIP Call, Logan Airport will most likely rank as one of the highest sources of NOx when compared to these same sources.

Aircraft Emissions Reduction Measures and Strategies

DEP's past comments on the GEIR have recommended measures and strategies to reduce emissions from Logan Airport. The recommendations include both specific measures as well as policies that could be initiated to ensure that future emissions from Logan Airport do not exceed existing 1999 levels. For example, DEP has commented that emissions at Logan Airport should be capped at 1999 levels. The basis for this recommendation is that Massachusetts is a serious nonattainment area for ozone and is required under the Clean Air Act Amendments of 1990 to meet health-based clean air standards by 1999 and to maintain these standards thereafter. In addition, EPA adopted a more stringent 8-hour ozone standard in 1997 after a lengthy scientific review process. EPA determined that a more stringent standard was needed to protect public health. It is likely that additional emissions reductions beyond those already planned for will be needed for Massachusetts to meet the 8-hour standard for ozone.

DEP is encouraged by Massport's willingness to explore opportunities to mitigate expected emissions due to increased activity at Logan. In response to the Secretary's Certificate on the 1997 Annual Update, DEP met with Massport on March 30, 1999. As a result of this meeting Massport has agreed to assist DEP by providing data to assess the potential emissions reductions from implementing emissions-based landing fees. In addition, Massport indicated that they are conducting a survey and inventory of ground service equipment (GSE). DEP believes this inventory will provide important data to target and plan for the conversion of GSE to less-polluting alternatives.¹ DEP recommends the following strategies and measures as air pollution mitigation for Logan Airport.

9.4

Airport Emissions Caps

McGuire Air Force Base in New Jersey has established an emissions budget under the federal General Conformity Rule, 40 CFR Parts 6, 51, and 53 as part of a proposal for base realignment.¹ This emissions budget creates a level of emissions for 1996 and 1999 that this airport may not exceed for these years or in the future without creating emissions offsets or requesting a SIP revision. The budget includes thirty source categories of emissions on the base. Another example of a cap approach is John Wayne Airport in Orange County California where the number of gate operations is limited to a certain number.

¹ An emissions budget is defined as the portion of a State Implementation Plan's projected emissions inventory that describe the levels of emissions (mobile, stationary, area, etc.) that provide for meeting reasonable further progress milestones, attainment, and/or maintenance for any criteria pollutant or its precursors.

As mentioned above, DEP suggests that emissions for Logan Airport be capped at 1999 levels and believes that McGuire Air Force Base and John Wayne Airport provide examples that this strategy is workable. 9.5

Economic Incentives for Cleaner Aircraft Engines

European airports have adopted policies where aircraft landing fees are established based on the emission characteristics of the aircraft. An example of a results-oriented emissions charge program is in Sweden where an aircraft emission charge for NOx and hydrocarbons (HC) was adopted in 1989. Two years later, HC emissions had declined by 62%, in part due to a decision by the domestic airline industry to modify the F28 fleet. Zurich Airport adopted an emissions charge in September of 1997 derived by decreasing landing fees by 5% and then redistributing the charge based on the emissions characteristics of the aircraft. The goal of the variable emissions charge is to provide an economic incentive for the airline industry to phase in cleaner engines and to deploy cleaner aircraft to areas with air quality problems. The Canton of Zurich established the aircraft emission charge program with the principle that all emission sources will have to contribute their share of emission reductions to meet air quality goals. Similar to U.S. airports, European airports are experiencing growth in travel demand and the relative contribution of airports to air pollution will continue to increase without further control strategies or programs.

To date, no airport in the United States has established an aircraft emissions charge, and this specific type of charge is not referenced in federal statute, case law or regulation. There is no direct legal precedent establishing the right of states and political subdivisions that own or operate airports to impose aircraft emission charges on commercial airlines. However, nothing in federal statute, case law or regulation prohibits the establishment of an aircraft emission charge. In fact, aircraft emission charges are a fairer approach to allocating the cost of mitigating air pollution generated by commercial aircraft than the weight-based landing fee system currently in place at most airports.

DEP's understanding is that airport operators assess aircraft landing fees to recover the costs of operating the airport; these fees may include the cost of environmental compliance. To the extent that Massport and the airlines are subject to an emissions cap and are responsible to mitigate air pollution from their activities, the adoption of an emissions-based landing fee system is warranted within the bounds of recovering the cost of environmental compliance and as a means to encourage cleaner aircraft engines. 9.6

Airside Operational Improvements

The DEIS/R proposes taxiway improvements including the Centerfield Taxiway, reconfiguring the Southwest Corner Taxiway System, extending Taxiway Delta and realigning Taxiway November. These improvements will reduce aircraft taxi time and associated emissions. DEP recommends that other measures be implemented at Logan to further reduce emissions from taxiing such as more widespread use of single engine taxiing. Terminal gate electrification is another measure with potential to reduce emissions significantly. DEP recognizes that these types of policies may be voluntary, but recommends that Massport provide further incentives or disincentives to increase participation by the airlines. These strategies not only reduce emissions, but also provide cost savings to the airline industry through fuel savings. Delta Airlines, for example, has reported savings of \$5.9 million/year at Atlanta Airport alone. 9.7

Ground Service Equipment

Massport has made progress converting ground service equipment (GSE) and ground service vehicles to clean alternative fuels including compressed natural gas (CNG) and electric. DEP is encouraged by a program developed under the "Clean Air Partners" where tenants can purchase and be reimbursed for electric GSE equipment. However, despite this progress, the emissions inventory of emissions for all pollutants is projected to increase significantly in this category.

9.8

As mentioned above, Massport is in the process of inventorying GSE equipment at Logan. DEP believes this inventory is a critical first step for Massport to adopt a plan for vehicle and equipment conversions with specific emissions reduction targets. In addition to a plan for emissions reductions, Massport should actively promote these types of strategies and institute leasing agreements with the airlines and service providers to convert GSE.

Ground Access

Massport reported a decrease in HOV ridership levels from 1996-1997 in the 1997 GEIR Annual Update. This decrease was a result of another decline in the number of MBTA Blue Line transit riders accessing the airport; the number of transit riders has been declining since 1994. DEP is hopeful that the Blue Line Modernization project as well as the Airport Intermodal Transit Connector (AITC) will reverse this decline in transit ridership to the airport.

Massport has adopted an airport passenger high occupancy vehicle (HOV) modeshare goal of 35.2% when annual airport passengers reach 37.5 million. DEP has commented previously that the targeted HOV modeshare goal of 35.2% should be higher, but Massport is reluctant to set a higher goal citing that HOV ridership increases may be harder to attain in the future. Nevertheless, DEP believes a higher modeshare is essential to accommodate the projected increase in air passengers without increasing air pollution from ground access vehicles. DEP recommends that MEPA require Massport to adopt a higher HOV modeshare goal and a specific action plan to reverse the trend of declining transit ridership. DEP believes these actions should precede the proposed Logan Airside Improvements Project.

9.9

One particular strategy that has been adopted by other airports is the consolidation of courtesy vehicles that serve rental car companies. Currently these courtesy vehicles circle Logan and pick up only their own customers. However, when there are no customers waiting, the vehicles create needless vehicle miles traveled (VMT), congestion and air pollution emissions. DEP recommends that Massport explore this strategy.

Construction Period Impacts

As MEPA is aware, last year the Central Artery Project, in cooperation with EPA-Region I, EOE, Northeast States for Coordinated Air Use Management (NESCAUM) and DEP, with assistance from the Manufacturers of Emission Control Association (MECA), launched the Clean Air Construction Initiative. This program is the first in the nation to retrofit existing heavy construction equipment used at major public works/infrastructure projects with pollution control devices targeted at reducing diesel emissions and, consequently, reducing the localized adverse health impacts and nuisance conditions they may create. To date, ten (10) pieces of Central Artery construction equipment have been retrofitted and another sixty (60) pieces

are scheduled to be retrofitted by mid-1999.

In addition to implementation of diesel retrofit activities for the CA/T Project, DEP is actively discussing similar mitigation

actions for one or more projects being proposed by MBTA and MWRA and is planning to initiate discussions relative to a number of other large construction projects within the Boston Area.

DEP believes that the implementation of additional diesel emission controls on on-site heavy construction equipment can significantly mitigate localized, adverse air quality impacts. DEP recommends that MEPA include in its EIR scope the requirement that such actions be assessed by Massport for implementation as part of all construction activities related to construction at Logan Airport.

9.10

Parking Controls

Logan Airport and a portion of East Boston are subject to a parking freeze on airport-related parking. These parking freezes are included in the SIP as a measure to reduce ground-level ozone and carbon monoxide. Since the amendment of the Logan Freeze and adoption of the East Boston Freeze in 1989, Massport has made progress in relocating employee parking off of the airport and in encouraging less-polluting modes of access to the airport. However, DEP is aware of a proliferation of airport-related parking uses outside of the freeze boundaries most notably in Chelsea and in South Boston. DEP recommends that Massport complete a comprehensive inventory of all airport-related parking serving Logan and, if necessary, propose a management plan that is consistent with the goals of the parking freezes.

9.11

Study of Regional Transportation Alternatives

The DEIS/R reiterates Massport's estimate in the GEIR update that up to 7.3 million passengers can be diverted from Logan Airport to surrounding regional airports, rail and video teleconferencing. In comments on the 1994/1995 GEIR Update, DEP cited the need for an assessment and a comparison of the environmental impacts of regional aviation alternatives. The context of these comments is that DEP is in the position of reviewing many proposed airport projects without adequate information to assess their environmental impacts comparatively. DEP believes these comments are still relevant particularly in the context of the proposed project. As such, DEP recommends a more detailed study to look at the environmental impacts of the potential passenger diversion from Logan to allow for a comparison. Study components should include, at a minimum, impacts on air quality, vehicle miles traveled and wetlands.

9.12

Excavate and Building Demolition Materials:

Section 6.6 of the DEIS/R describes Massport's proposed procedures for management of the approximately 900,000 c.y. of excavate and building demolition materials (240,000 c.y. of this total relates to the need for removal and off-site management of a portion of the CA/T soils currently located on Governors Island that would interfere with the proposed runway 14/32).

- Page 6-99 describes the "approach" Massport is taking with regard to management of these materials which is, "...no excavation materials from Logan, no matter what the characterization results, will be disposed at sensitive areas, such as residential, recreational or wetland areas." DEP completely concurs with this approach and applauds Massport for taking such a protective position.

9.13

- Page 6-116 describes the anticipated project construction sequencing and indicates that the overwhelming majority of excavate production is anticipated to occur in the first two years of the project (2000 and 2001). Page 6-111 includes the following statements,

"The majority of the excavated material has potential for being recycled as landfill daily cover and/or as landfill contouring closure material. Based on existing physical and chemical characteristics, the materials are compatible for recycle as daily cover and/or contouring closure materials and meet the MA DEP requirements for such applications.

"Discussions with commercial landfill owners/operations have indicated that there is capacity at in-state and out-of-state landfills for the materials. Therefore, recycling as landfill daily cover and/or closure materials is considered to be the most viable soil management alternative."

DEP concurs with Massport's intention to beneficially reuse the excavate at landfills as either daily cover or pre-cap grading/shaping material ("contour closure material"). Based upon the status of unlined landfill closures and commercial landfill capacity (and therefore the "need" for mildly contaminated excavate), when Massport will require capacity for its excavate there may not be adequate demand for all the Logan material in the timeframe required by project sequencing. In this regard, DEP recommends that Massport assess backup options to minimize the potential for delays and/or cost increases.

9.14

- Relative to removal of the 240,000 c.y. of CA/T excavate currently located at Governors Island, staff from DEP has been working with representatives from Massport and Massachusetts Transportation Authority (MTA) to devise a confirmatory soil sampling program to allow for expedited and cost-effective off-site management of these soils.
- In various sections of the report (including 5-71, 5-75, 6-97, etc.) erroneous statements are made relative to the applicability of c.21E and the Massachusetts Contingency Plan (MCP) as it relates to the CA/T materials on Airport property. The following are relevant discussions and corrections for Massport to include into their Final document.

9.15

- (1) Page 5-71 includes the following statement,

"All clearance material was removed by the MHD and disposed of off-site in 1996. In relation to the MCP, the corresponding terms for "clearance" and "non-clearance" are "remediation" and "non-remediation" waste, respectively."

The first sentence is correct, but the second with regard to defining Clearance and Non-Clearance is not. The terms Clearance and Non-Clearance relate strictly to determining whether or not the soils to be excavated for the CA/T Project exceed specific contaminant thresholds (a copy of the thresholds are appended to this comment letter) as it relates to off-site disposal options and worker protection. The definitions for these categories of CA/T soils is specified in the May 7, 1997, Amended MOU between MHD and DEP for management of CA/T excavate, and are indicated below.

"Clearance Criteria mean the concentration criteria for soils and groundwater requiring clearance analysis, as defined in the Clearance Procedures and as set forth in attached Exhibit B to this MOU."

"Non-Clearance Areas mean those portions of a Program Area outside of Clearance Areas identified by a Field Characterization Report, a Clearance Report, and/or a CA/T IRAC."

Much of the Non-Clearance soils are in-fact "remediation wastes" as defined under c.21E and the MCP.

(2) Page 5-75 includes the following statement,

"The Governors Island materials consist of silty sand with pockets of cohesive soils. In general, the stabilized harbor sediments contain lower contaminant levels than the excavated soils. The Response Action Outcome statement prepared by Massport concludes that a condition of No Significant Risk exists at Governors Island."

The characterization of harbor sediments as "less contaminated" than the excavated soils is incorrect. Most of the 90,000 c.y. of sediments placed into a double-lined landfill on Governors Island are significantly more contaminated than the CA/T soils placed at adjacent areas of Governors Island. The placement of the CA/T dredged sediments and excavated soils was specifically approved by DEP under the authority of c.21E/MCP in November 22, 1994 correspondence based on submission by MHD and approval by DEP of a Human Health and Ecological Risk Assessment.

(3) Page 6-97 includes the following statement,

"As described in Section 5.6, materials stored at Governors Island as part of the Central Artery/Tunnel Project (CA/T Project) were initially classified by the Massachusetts Highway Department (MHD) using criteria defined in a Memorandum of Understanding (MOU) between the MA DEP and MHD. While these criteria were initially used to characterize the materials, the MOU criteria have since been superseded by standards established in the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000)."

The discussion relative to the MOU excavate criteria being superseded by the MCP is incorrect. The MOU's authority is derived directly from c.21E, see excerpts below taken from the MOU.

"In accordance with the provisions of c.21E §3(c), authorizing DEP to integrate the implementation and enforcement of c.21E with other programs established for the protection of public health, safety, welfare, and the environment, MHD and DEP enter into and agree that this MOU sets forth the procedures to be followed by DEP and MHD to comply with c.21E and the MCP with respect to all response actions undertaken and conducted in connection with the design and construction of the Central Artery/Tunnel Project.

"It is the intent and understanding of DEP and MHD that all words and phrases used in this MOU which are defined in the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, (hereinafter "M.G.L. c.21E" or "c. 21E") and/or in the Massachusetts Contingency Plan, 310 CMR 40.0000 et. seq.,

(hereinafter "MCP" or "the MCP"), shall have that definition ascribed to them unless otherwise expressly defined herein."

DEP has previously made a formal determination that the permanent placement of the CA/T dredged sediments and excavate at Governors Island does not result in a condition of Significant Risk as defined in the MCP.

The DEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Specific questions regarding the air quality issues should be addressed to Christine Kirby at (617) 292-5631. Specific questions regarding solid waste/contaminated soils issues should be addressed to Steve Lipman at (617) 292-5698. General questions regarding these comments should be directed to David Shakespeare at (978) 661-7797.

Sincerely,

John Felix,
Deputy Regional Director,
MEPA Review Coordinator

cc: David Murphy, DEP/Commissioner's Office, Boston
Steve Lipman, DEP/Commissioner's Office, Boston
Christine Kirby, BWP/AQ Boston

Letter 9

MA Department of Environmental Protection Northeast Regional Office John Felix, Deputy Regional Director, MEPA Review Coordinator

Code	Topic 1	Topic 2	Comment	Response
9.1	Mitigation	Initiatives	While DEP agrees that the project, and runway 14/32 in particular, will not be the primary factor that will draw additional air traffic to Logan, air travel and passenger demand is projected to increase dramatically. The air pollution impacts of this additional air traffic are substantial and merit the implementation of all feasible mitigation measures....	Refer to the <i>Logan Airport 1999 ESPR</i> (previously GEIR) for the status of Massport's mitigation programs and to Chapter 8 of the Supplemental DEIS/FEIR for a discussion of proposed Airside Project mitigation measures.
9.2	Mitigation	Initiatives	Massport's past and future commitments to mitigation measures through the environmental review process should be binding and a funding plan should be prepared to ensure their implementation. DEP recommends that Massport prepare and include this plan in the Final EIS/R.	Massport's mitigation measures are reinforced through compliance with M.G.L. Chapter 30A, Section 61 and through specific state and federal certificates approving projects that have mitigation. The status of the Section 61 Finding commitments are tracked and reported in the <i>Logan Airport 1999 ESPR</i> (previously GEIR). See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR. Massport follows a five-year capital budget planning process to provide context for financing specific projects. As these projects, which include established mitigation measures, proceed to the implementation stage, appropriate financing plans are finalized, which can include proceeds from bond issues, available internal funds, and grant funds. These plans are developed through the Massport Board approval process.
9.3	Air Quality	Impacts	...long-term emissions projections indicate that NOx and CO emissions will increase in 1999 and in 2010 for total airport emissions. VOC emissions decreased from 1990-1997 due to a change in aircraft fleet mix and controls on motor vehicles, but have increased since 1997. The increases in emissions are directly attributable to increases in aircraft operations due to increased passenger demand. Airport and aircraft emissions represent the largest uncontrolled source of air pollution nationwide and in Massachusetts. DEP is particularly concerned about the projected increase in NOx emissions. In 2010, after implementation of further NOx reductions pursuant to EPA's NOx SIP Call, Logan Airport will most likely rank as one of the highest sources of NOx when compared to these same sources.	The EOEA May 7, 1999 Certificate on the Airside Project Draft EIS/EIR requested that Massport undertake a feasibility study of implementing measures to reduce NOx emissions at Logan Airport. This study is currently underway and will be presented to MEPA by the end of March 2001. Appendix A (<i>Ozone Modeling Support Document for the New England Domain</i>) of DEP's Attainment Submittal of April 1998, indicated that on-road mobile sources are a greater concern for NOx and area sources a greater concern for VOCs than Logan Airport.
9.4	Air Quality	Mitigation	DEP is encouraged by Massport's willingness to explore opportunities to mitigate expected emissions due to increased activity at Logan.	Massport is actively involved in many air quality initiatives and explored other options to reduce emissions from activities at Logan Airport in the <i>Logan Airport 1999 ESPR</i> (previously GEIR).
9.5	Air Quality	Mitigation	...DEP suggests that emissions for Logan Airport be capped at 1999 levels and believes that McGuire Air Force Base and John Wayne Airport provide examples that this strategy is workable.	Refer to response to Comment 9.3.

Code	Topic 1	Topic 2	Comment	Response
9.6	Air Quality	Emission-Based Landing Fees	To the extent that Massport and the airlines are subject to an emissions cap and are responsible to mitigate air pollution from their activities, the adoption of an emissions-based landing fee system is warranted within the bounds of recovering the cost of environmental compliance and as a means to encourage cleaner aircraft engines.	Refer to response to Comment 9.3.
9.7	Air Quality	Taxiway Improvements	These improvements will reduce aircraft taxi time and associated emissions. DEP recommends that other measures be implemented at Logan to further reduce emissions from taxiing such as more widespread use of single engine taxiing.	Refer to response to Comment 9.4.
9.8	Air Quality	Alternative Fuels	Massport has made progress converting ground service equipment (GSE) and ground service vehicles to clean alternative fuels...Massport is in the process of inventorying GSE equipment at Logan. DEP believes this inventory is a critical first step for Massport to adopt a plan for vehicle and equipment conversions with specific emissions reduction targets...Massport should actively promote these types of strategies and institute leasing agreements with the airlines and service providers to convert GSE.	Massport has taken enterprising steps to encourage tenant use of alternative fuels [electric and compressed natural gas]. Massport will use the results of the ground service equipment survey to assess the feasibility of establishing alternative fuel targets for tenant vehicles and ground service equipment.
9.9	Ground Transportation	HOV	DEP recommends that MEPA require Massport to adopt a higher HOV modeshare goal and a specific action plan to reverse the trend of declining transit ridership. One particular strategy that has been adopted by other airports is the consolidation of courtesy vehicles that serve rental car companies. DEP recommends that Massport explore this strategy.	The <i>Logan Airport 1999 ESPR</i> (previously GEIR) reports on Massport's progress on meeting its air passenger goal of 35.2 percent by the time air passenger volumes reach 37.5 million annual passengers. Consideration will be given to ways to enhance transit ridership and use of the Logan Express bus service. In addition, Massport is considering consolidation of car rental facilities, which will facilitate the consolidation of the courtesy vehicles serving the rental car companies.
9.10	Construction	Air Quality	DEP believes that the implementation of additional diesel emission controls on on-site heavy construction equipment can significantly mitigate localized, adverse air quality impacts. DEP recommends that MEPA include in its EIR scope the requirement that such actions be assessed by Massport for implementation as part of all construction activities related to construction at Logan Airport.	Massport will require contractors to retrofit their heavy construction equipment with advanced pollution control devices in accordance with DEP's Clean Air Construction Initiative. Contractor owned equipment, such as front-end loaders, backhoes, cranes and excavators, will be retrofitted with oxidation catalysts to filter and break down hydrocarbons, particulate matter and carbon dioxide from diesel emissions. Refer to Section 6.9 and Chapter 8 of the Supplemental DEIS/FEIR for additional discussion of air quality mitigation measures during the construction period.
9.11	Air Quality	Parking Freeze	DEP recommends that Massport complete a comprehensive inventory of all airport-related parking serving Logan and, if necessary, propose a management plan that is consistent with the goals of the parking freezes.	The <i>Logan Airport 1999 ESPR</i> (previously GEIR) provides an inventory of parking at Logan Airport, clearly identifying Massport's adherence to the parking freeze. This information is provided to DEP on a quarterly basis and is reported in the ESPR or subsequent Annual Updates. These documents also discuss parking demand and management at Logan Airport.
9.12	Regional Transportation	Diversion	The DEIS/R reiterates Massport's estimate in the GEIR update that up to 7.3 million passengers can be diverted from Logan Airport to surrounding regional airports, rail and video conferencing...DEP recommends a more detailed study to look at the environmental impacts of the potential passenger diversion from Logan to allow for a comparison. Study components should include, at a minimum, impacts on air quality, vehicle miles traveled and wetlands.	In accordance with the MEPA Certificate on the Airside Project Draft EIS/EIR, the Supplemental DEIS/FEIR contains a summary of the environmental impacts of growth at the regional airports, based on existing available environmental documents and studies. Refer to Appendix B of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
9.13	Soil/Sediment	Reuse/ Disposal Option	Page 6-99 describes the "approach" Massport is taking with regard to management of these materials which is, "...no excavation materials from Logan, no matter what the characterization results, will be disposed at sensitive areas, such as residential, recreational or wetland areas." DEP completely concurs with this approach and applauds Massport for taking such a protective position.	Comment noted.
9.14	Soil/Sediment	Reuse/ Disposal Option	DEP concurs with Massport's intention to beneficially reuse the excavate at landfills as either daily cover or pre-cap grading/shaping material...when Massport will require capacity for its excavate there may not be adequate demand for all the Logan material in the timeframe required by project sequencing. In this regard, DEP recommends that Massport assess backup options to minimize the potential for delays and/or cost increases.	<p>Massport recognizes that there may not be sufficient in-state landfill capacity. Alternative sites will be examined during design. The volume of soil excavated has been reduced as a result of the on-going removal of stockpiled CA/T soil material from Governors Island, and the findings of a subsurface investigation program that much of the existing soil material on the airport is suitable for construction and therefore does not have to be removed.</p> <p>Massport recently completed a soil boring and chemical analytical program along the centerlines of Runway 14/32 and the Centerfield Taxiway. The preliminary soil chemical data indicate that the large majority of soil to be excavated is not regulated soil in that it did not exceed the S-2 Reportable Concentration. Therefore, this excavate may be recycled at in-state or out-of-state lined landfills or used at industrial sites for fill. In accordance with Massport's Soil Management Plan, the excavate will not be used for fill or any other use at environmentally sensitive sites such as near wetlands, playgrounds, water supplies, etc.</p>
9.15	Soil/Sediment	Reuse/ Disposal Option	In various sections of the report (including 5-71, 5-75, 6-97, etc.) erroneous statements are made relative to the applicability of c.21E and the Massachusetts Contingency Plan (MCP) as it relates to the CA/T materials on Airport property.	<p>The sections referenced in the comment have been clarified.</p> <p>The soil classifications used in the Airside Project Draft EIS/EIR were a combination of terms from the original MOU between the DEP and MassHighway for the temporary storage of soil at Governors Island and the current Massachusetts Contingency Plan (MCP). The older MOU terminology was included for background. To avoid further confusion, the Supplemental DEIS/FEIR addresses these soils using only the MCP terminology.</p>



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

LETTER 10

21 April 1999

NHESP File: 96-384

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Project Name: Logan Airside Improvements
Proponent: Massport, Federal Aviation Administration
Location: Boston
Document Reviewed: DEIR/EIS
EOEA File Number: 10458

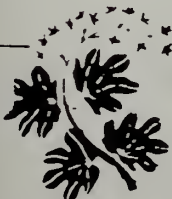
Attention: MEPA Unit/Arthur Pugsley

Dear Secretary Durand,

The Natural Heritage and Endangered Species Program ('NHESP') has reviewed the Draft Environmental Impact Report for the Logan Airside Improvements project and would like to offer the following comments regarding impacts to state-protected rare species.

The proposed Logan Airside Improvements project will impact nesting and feeding habitat of the state 'endangered' Upland Sandpiper (*Bartramia longicauda*) and will result in the 'taking' of a state-protected rare species pursuant to the Massachusetts Endangered Species Act (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00). NHESP has been meeting with Massport and their consultants to work out the details of a Conservation Permit that would allow a 'taking' in return for both on-site and off-site mitigation. The on-site mitigation has been detailed in the DEIR/EIS. The proposed off-site mitigation will entail restoring approximately 150 acres of Upland Sandpiper habitat at the Massachusetts Military Reservation. The details of the proposed restoration work have not been completed but Massport should finalize these details with NHESP before the final EIR is submitted to MEPA.

10.1

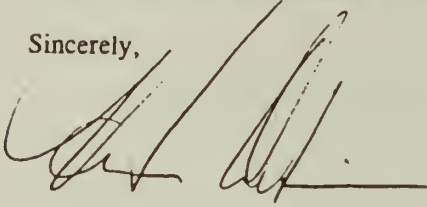


Natural Heritage & Endangered Species Program

Route 135, Westborough, MA 01581 Tel: (508) 792-7270 x 200 Fax: (508) 792-7275
An Agency of the Department of Fisheries, Wildlife & Environmental Law Enforcement
<http://www.state.ma.us/dfwele>

We appreciate the opportunity to comment on this project.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Hanni Dinkeloo', written over a horizontal line.

Hanni Dinkeloo
Endangered Species Counsel

cc. John Silva, FAA
Betty Desrosiers, Massport
Stewart Dalzell, Cortell Assoc.
Seth Kaplan, Conservation Law Foundation

Letter 10

MA Division of Fisheries & Wildlife, National Heritage & Endangered Species Program Hanni Dinkeloo, Endangered Species Counsel

Code	Topic 1	Topic 2	Comment	Response
10.1	Ecosystems	Rare Species	The proposed Logan Airside Improvements project will impact nesting and feeding habitat of the state 'endangered' Upland Sandpiper (<i>Bartramia longicauda</i>) and will result in the 'taking' of a state protected rare species pursuant to the Massachusetts Endangered Species Act (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00). NHESP has been meeting with Massport and their consultants to work out the details of a Conservation Permit that would allow a 'taking' in return for both on-site and off-site mitigation. The details of the proposed restoration work have not been completed but Massport should finalize these details with NHESP before the final EIR is submitted to MEPA.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.



OFFICE OF THE PRESIDENT
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1007

LETTER 11

THOMAS F. BIRMINGHAM
PRESIDENT

April 22, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOEa No. 10458
Cambridge Street 20th Floor
Boston, MA 02202

Dear Secretary Durand:

Since the inception of the debate over the proposed new runway at Logan International Airport, I have sought to assess the issue on the merits and with an emphasis on fact-based, verifiable analysis. Although a purely parochial view would have dictated my fierce and immediate opposition to the proposal, that was not my approach. I chose to put research above demagoguery because ultimately that is in all of our best interests.

This proposal has statewide and regional implications. It needs to be reviewed in that broad context with regard to our environment, our economy and the quality of life experienced by the residents of Massachusetts. I have listened to proponents and opponents and have heard the variety of arguments, analyses and projections.

With the comment period in the MEPA process drawing to an end, I feel compelled to share my serious reservations about the proposed new runway. The 17 questions I have included below suggest that significant issues about the efficacy and desirability of the proposed runway remain unanswered.

I am requesting that Massport withdraw its application before the Secretary and that a "Blue Ribbon Commission" be formed to examine the issues posed not only with regard to Logan, but also concerning the adequacy of this entire region's air transportation system.

This Commission must be comprised of individuals who represent the variety of interests involved. A Commission can work—and inspire the respect and confidence of interested parties—only if the review is reasoned, thorough and balanced. I am not inclined to disparage any individuals currently working at or for Massport but as an institution it suffers from a serious lack of credibility. There is too much prologue of malleable commitments and revisionist history for a decision of this import to rely solely

11.1

on Massport's assessments and recommendations. A number of the questions I have raised concern the appearance of selectivity and bias in the information Massport has proffered to further its goal.

It is my hope that Massport will voluntarily agree to this approach. It is in its best interest for any developments to grow out of a substantiated, defensible and comprehensive review. If Massport, however, is not willing to turn to an unbiased, top-level commission at this stage, then I am prepared to consider legislation to impose a moratorium. My hope is that we can move forward with a commitment to cooperation and information. If that is not possible, I will oppose runway construction until a "Blue Ribbon Commission" has sufficient time to conduct a study and make its report.

There ought not to be a rush to judgment when the infrastructure, air quality and livability of the Commonwealth is at stake. We need time and advice to move forward with greater knowledge and confidence than anyone can possess at this point.

1. Massport has indicated that alleviating delays is the primary reason for the runway. If delays are such a problem, then why isn't there detailed analysis of the historical delay data in the Draft Environmental Impact Study/ Report (EIS/R)? 11.2
2. Delays declined between 1993 and 1997 (with the exception of 1996). Massport has provided insufficient analysis of this trend. Can anything be learned from this experience? 11.3
3. Delay management is at the crux of Massport's argument for the runway. Yet the EIS/R delay management review fails to explore the issue fully. Instead the runway is posited as the best solution. Why does Massport conclude that a runway is the foremost option at this point, when other alleviating measures are not fully explored? 11.4
4. Massport contends that the proposed new runway will reduce delays. Yet there is an acknowledgement that in the future delays will increase above current levels. There is some indication delays will return to current levels within 5 years. If this is accurate, how can the runway be portrayed as a long-term solution to alleviate delays? Why isn't there a comprehensive plan to meaningfully alleviate delays long-term? 11.5
5. Massport numbers seem to show that in 2010 peak pricing alone is more effective to reduce delay. Is that accurate? If so, why isn't Massport proposing that approach now? 11.6
6. Massport raises concerns about the economic impact of peak pricing on specialized markets such as Cape Cod. Why can't special exemptions be put in place for these types of specialized markets? Alternatively, why can't at least some of the air traffic related to these specialized markets use other airports, such as Hanscom or Worcester? 11.7
11.8

7. Would the new runway and midfield taxiway provide long-term reduction of airport congestion or will the same problems reoccur if flight volume is increased? What prevents flight volume from increasing? 11.9
8. Has Massport utilized all of the non-Logan options to reduce airport congestion, including increased use of regional airports, Hanscom Field, congestion pricing and other alternatives? 11.10
9. Massport data seem to suggest there could be a tripling of airplane travel over East Boston, Chelsea, South End, and parts of South Boston, Roxbury and Jamaica Plain. Is this accurate? What is the justification for further impacting these neighborhoods? 11.11
10. Massport suggests there will be a reduction in noise in parts of East Boston, Revere, South Boston, Dorchester and Milton. How can this be reconciled with Massport's proposal to construct a center field taxiway for 4-22 runways? 11.12
11. What mitigation measures would be provided to the impacted communities (beyond soundproofing of homes)? 11.13
12. Massport makes the promise to use the new runway in only one direction. How can Massport assure residents, who have experienced Massport's efforts to amend environmental documents by breaking promises they made, that this is different? Are there enforceable guarantees for no overland flights using the new runway, and what controls will be in place to prevent the Federal Aviation Administration from overriding local agreements? What is to prevent Massport from working to amend conditions set forth in the EIR? 11.14
13. Reducing the number of small aircraft using Logan airport would reduce delays. Is it accurate that aircraft carrying fewer than 50 passengers use 45% of Logan take-off and landing capacity? Where does Logan rank nationally in terms of the number of flights going in and out the airport? And where does Logan rank nationally in terms of the number of small flights going in and out of the airport? Doesn't the construction of a short 14-32 runway worsen delay by encouraging continued investment in small aircraft? 11.15
14. Don't inefficient and outmoded terminals contribute to delays at Logan? How much of the problem is due to aircraft waiting to get access to gates and physical constraints on the number of ticket agents and baggage handling? What is Massport's plan for addressing one of its more problematic terminals, Terminal A? 11.16
15. What are Massport's plans to handle the increased need for public transportation to the airport, once capacity is increased? 11.17

16. Massport is now touting plans to increase usage of Worcester Airport. Why did Massport wait until public pressure arose for regional airports to file the bill that gives them control of this airport? Are there other options that could be pursued but due to lack of interest remain unexplored?

11.18

17. There are concerns about the levels of increased toxic emissions from aircraft. What sort of assurance can be provided that the state's implementation plan to comply with the Federal Clean Air Act will not be jeopardized by increased air traffic? Even if the state is in technical compliance, there ought to be an estimate as to what level of increase could result from the growth in air traffic at Logan before the runway proceeds.

11.19

I respectfully request you to consider this overwhelming number of unanswered questions in deciding the sufficiency of Massport's environmental impact report for this project.

Ultimately, I believe it would be fundamentally irresponsible for a project of this magnitude to move forward while major issues remain unresolved. For this reason, I hope Massport will withdraw its application until a truly independent commission can comprehensively review the issue. Also, I intend to support a legislative moratorium if Massport proceeds with this project nonetheless.

Thank you for considering these comments.

Very truly yours

Thomas F. Birmingham

Letter 11

MA State Senator Thomas F. Birmingham

Code	Topic 1	Topic 2	Comment	Response
11.1	Environmental Review Process	Blue Ribbon Panel	I am requesting that Massport withdraw its application before the Secretary and that a "Blue Ribbon Commission" be formed to examine the issues posed not only with regard to Logan, but also concerning the adequacy of this entire region's air transportation system.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March 2000 and then met at least monthly with a final meeting in December 2000. Twelve meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS; the Airside Project Draft EIS/EIR; responses to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR; and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies have concluded that The Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high-speed rail are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of regional transportation alternatives to Logan Airport and steps Massport has taken to foster increased use of these alternatives.</p> <p>Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999, attendance at a second summit in December 2000, and its assumption of operating responsibility for the Worcester Regional Airport in January 2000. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of Massport's initiatives in support regional transportation alternatives.</p>
11.2	Purpose and Need	Delay	Massport has indicated that alleviating delays is the primary reason for the runway. If delays are such a problem, then why isn't there detailed analysis of the historical delay data in the Draft Environmental Impact Study/ Report (EIS/R)?	<p>Chapters 1 and 4 of the Supplemental DEIS/FEIR provide analysis of delays at Logan Airport. Delays primarily occur when wind or weather conditions require the use of configurations with fewer than three active runways or when poor weather requires increased separation distances between aircraft. Proposed Runway 14/32 would be designed to reduce delays at Logan Airport from adverse winds. Section 1.6 of the Supplemental DEIS/FEIR contains a description of the delay factors at Logan Airport, and a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.</p>

Code	Topic 1	Topic 2	Comment	Response
11.3	Purpose and Need	Delay	Delays declined between 1993 and 1997 (with the exception of 1996). Massport has provided insufficient analysis of this trend. Can anything be learned from this experience?	<p>Logan Airport flight delays, as measured by the FAA, did decline between 1993 and 1997. Nevertheless, the same data show that Logan Airport was consistently ranked as one of the nation's most delayed airports throughout this period. In 1998, delayed flights at Logan Airport, as reported by the FAA increased by more than 30 percent and continued to increase in 2000. In 2000, Logan Airport was second most delayed in the United States for arrivals. This represents the worst rank in Logan Airport's history. Refer to Chapter 1 of the Supplemental DEIS/FEIR for a discussion of Logan Airport delays caused elsewhere in the system.</p> <p>There are three reasons for the decline in delays between 1993 and 1997. First, in 1997, the number of hourly scheduled flights was less than Logan Airport's normal operating capacity of 120 flights per hour, unlike 1993, when airlines scheduled flights well beyond Logan Airport's hourly capacity. Second, Logan Airport's hourly demand profile is flatter than it was in 1993. Airlines are spreading scheduled flights throughout the day taking advantage of Logan Airport's off-peak hours (e.g., 10 AM to 1 PM). Finally, airlines are carrying more passengers per flight. In fact, with roughly the same number of flights as in 1993, Logan Airport accommodated over 3 million more passengers. One reason for this is that the regional carrier network serving New England is more efficient. In 1993, there were three regional carrier systems serving 2.1 million regional passengers at Logan Airport. Since 1994, Logan Airport has been served by two regional airline systems (Business Express, now American Eagle, and US Airways Express). These carriers handled 2.2 million Logan Airport passengers in 1998.</p> <p>Key lessons learned from this are: 1) while PPP might work in conditions of overscheduling, such as the 1993 environment, because there is no sustained period of flight overscheduling at Logan Airport today, PPP would not provide meaningful delay reduction in the current operating environment; and 2) while delays declined from 1993 to 1997, Logan Airport continued to be one of the most delayed airports in the country because, even though carriers were more efficient at scheduling flights, delays caused by wind and weather continued to occur.</p>

Code	Topic 1	Topic 2	Comment	Response
11.4	Purpose and Need	Delay	Delay management is at the crux of Massport's argument for the runway. Yet the EIS/R delay management review fails to explore the issue fully. Instead the runway is posited as the best solution. Why does Massport conclude that a runway is the foremost option at this point, when other alleviating measures are not fully explored?	<p>The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i>, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i>. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i>, published in July 1995. Based on the Feasibility Study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside Project analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.</p>

Code	Topic 1	Topic 2	Comment	Response
11.5	Delay	Solution	Massport contends that the proposed new runway will reduce delays. Yet there is an acknowledgement that in the future delays will increase above current levels. There is some indication delays will return to current levels within 5 years. If this is accurate, how can the runway be portrayed as a long-term solution to alleviate delays? Why isn't there a comprehensive plan to meaningfully alleviate delays long-term?	If no actions are taken to alleviate the delay problem, future delays will increase substantially. For example, under the 37.5M Low Fleet scenario, runway-related delays will nearly double (95 percent), or by 114,000 annual hours, over 1998 delay levels. By implementing the Preferred Alternative, delays will increase in the future as aircraft operations increase, because delays from inclement weather (IFR conditions), such as snowstorms or fog, cannot be avoided. The Preferred Alternative, however, significantly reduces delays that occur during clear weather conditions (VFR conditions). If no actions are taken, VFR delays will increase by 75 percent, or 38,000 hours, over 1998 levels. With the Preferred Alternative, VFR delays actually <i>decline</i> by 18 percent, or 9,000 hours. This represents a reduction in VFR delays of more than 50 percent compared to the No Action Alternative for the 37.5 M Low Fleet scenario.
11.6	Alternatives	Peak Period Pricing	Massport numbers seem to show that in 2010 peak pricing alone is more effective to reduce delay. Is that accurate? If so, why isn't Massport proposing that approach now?	The Airside analysis indicates that PPP is an effective option when airline's schedule beyond the normal hourly operating capacity of the airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
11.7	Alternatives	Peak Period Pricing	Massport raises concerns about the economic impact of peak pricing on specialized markets such as Cape Cod. Why can't special exemptions be put in place for these types of specialized markets?	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.

Code	Topic 1	Topic 2	Comment	Response
11.8	Regional Transportation	Regional Airports	...why can't at least some of the air traffic related to these specialized markets use other airports, such as Hanscom or Worcester?	Regional carriers that provide service between the Cape Cod and Island markets and Logan Airport are not likely to shift these services to other regional airports because doing so would reduce the number of passengers and the economic viability of such services. Regional carriers serving Logan Airport carry a mix of local and connecting passengers. As the largest city in New England, the Boston metropolitan area represents the largest concentration of demand for outlying regional carrier markets. Also, up to 50 percent of the passengers on regional carrier flights connect to other flights at Logan Airport. Shifting regional carrier flights to other airports, such as Manchester Airport or T.F. Green/Providence Airport would likely reduce the amount of on-board passenger traffic since a significant number of passengers are either traveling to Boston or connecting to flights that are not available from the outlying airports. For example, service to Manchester would not be a viable alternative for a Provincetown passenger traveling to a location in downtown Boston. Likewise, service to Providence would not be attractive to a Provincetown passenger trying to reach Denver, since there are no nonstop Denver services at T.F. Green/Providence Airport..
11.9	Alternatives	Runway 14/32, Taxiway Improvements	Would the new runway and midfield taxiway provide long-term reduction of airport congestion or will the same problems reoccur if flight volume is increased? What prevents flight volume from increasing?	Proposed Runway 14/32 and all other proposed projects would reduce current and future delays and enhance safety. The sooner that these improvements are implemented, the more long-term delay benefits will be realized. Major factors in airline competition are frequency of service and number of markets served. PPP was included in the airside improvement alternatives to address delays caused by airline over-scheduling. Airline over-scheduling is only a problem when flight demand during the peak hours exceeds the airfield's average VFR capacity. Because of competitive factors, airlines have reduced peak period flights since 1993. As a result, airline over-scheduling is not currently a problem at Logan Airport and Massport is not recommending the implementation of PPP at this time. Flight volume at Logan Airport is a function of the demand for air travel. Growth in air travel demand is principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports.
11.10	Alternatives	Other Non-Construction Alternatives	Has Massport utilized all of the non-Logan options to reduce airport congestion, including increased use of regional airports, Hanscom Field, congestion pricing and other alternatives?	Refer to response to Comment 11.8 and to Chapter 2 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
11.11	Noise	Runway Use	Massport data seem to suggest there could be a tripling of airplane travel over East Boston, Chelsea, South End, and parts of South Boston, Roxbury and Jamaica Plain. Is this accurate? What is the justification for further impacting these neighborhoods?	Also refer to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of runway use and to Sections 6.2 of the Supplemental DEIS/FEIR for a discussion of noise impacts. In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels. With the Preferred Alternative, when Logan Airport reaches 29 million passengers, overflights from Runway 4 arrivals and Runway 22 departures, which affect South Boston, Quincy, Milton, and Braintree, will decrease from 107,861 in 1998 to 58,305 operations. Similarly, overflights affecting Winthrop (Runway 27 arrivals and Runway 9 departures) will decline from 88,224 in 1998 to 55,805. As a result of the relief for these communities, flights over the water and flights over less impacted communities will increase. With Runway 14/32, the over-water procedure (Runway 14 and Runway 15 departures, Runway 32 and Runway 33 arrivals) becomes the most used set of runways with operations increasing from 34,222 in 1998 to 82,965. Overflights affecting the South End, parts of South Boston, and Roxbury (Runway 27 departures) will increase from 20,356 to 41,974, making this the fourth most used procedure, up from fifth in 1998. Overflights affecting Chelsea, the Eagle Hill section of East Boston, Everett, and Somerville (Runway 33 departures and Runway 15 arrivals) will increase from 9,804 to 35,801. This will become the fifth most used procedure, up from the sixth, or least used procedure in 1998.
11.12	Noise	Taxiway Improvements	Massport suggests there will be a reduction in noise in parts of East Boston, Revere, South Boston, Dorchester and Milton. How can this be reconciled with Massport's proposal to construct a center field taxiway for 4-22 runways?	The purpose of the proposed Centerfield Taxiway system is to improve the flow of taxiing aircraft and to reduce aircraft ground delay. With the Centerfield Taxiway in place, neighbors in Winthrop and East Boston adjacent to the taxiways will experience small reductions in ground noise. These are different from the noise level reductions that occur in parts of East Boston, Revere, South Boston, and Dorchester with the Preferred Alternative. Improvements in those communities are derived from the added flexibility afforded by Runway 14/32. It allows the redistribution of traffic so that there are fewer landings on Runway 4L and 4R and fewer takeoffs on Runways 22L and 22R. The taxiway itself has no bearing on these flights.
11.13	Noise	Mitigation	What mitigation measures would be provided to the impacted communities (beyond soundproofing of homes)?	Chapter 8 of the Supplemental DEIS/FEIR summarizes Massport's proposed project-specific mitigation program associated with the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
11.14	Alternatives	Runway 14/32	Massport makes the promise to use the new runway in only one direction. How can Massport assure residents, who have experienced Massport's efforts to amend environmental documents by breaking promises they made, that this is different? Are there enforceable guarantees for no overland flights using the new runway, and what controls will be in place to prevent the Federal Aviation Administration from overriding local agreements? What is to prevent Massport from working to amend conditions set forth in the EIR?	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 (heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations, which would thereby limit operational impacts over residential areas. To reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. It is anticipated that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>
11.15	Alternatives	Other Non-Construction Alternatives	Reducing the number of small aircraft using Logan Airport would reduce delays. Is it accurate that aircraft carrying fewer than 50 passengers use 45% of Logan take-off and landing capacity? Where does Logan rank nationally in terms of the number of flights going in and out the airport? And where does Logan rank nationally in terms of the number of small flights going in and out of the airport? Doesn't the construction of a short 14-32 runway worsen delay by encouraging continued investment in small aircraft?	<p>Refer to Section 8.5 of the Supplemental DEIS/FEIR for a discussion of ways the unidirectional restriction can be enforced. Small aircraft can be accommodated on any runway configuration at Logan Airport. Proposed Runway 14/32 would allow Logan Airport to maintain its full Visual Flight Rule capacity in northwest wind conditions and would not provide a new capability to accommodate small aircraft, nor would it encourage additional investment in this type of equipment. Based on an analysis of airline schedules for May 1999, 41.7 percent of Logan Airport's scheduled arrivals and departures were on regional aircraft with fewer than 50 seats. For calendar year 1998, Logan Airport ranked eighth among United States airports in terms of total aircraft operations. Based on May 1999 airline schedules, Logan Airport ranked fifth among United States airports in terms of scheduled arrivals and departures on aircraft with fewer than 50 seats and ranked seventh in terms of total scheduled aircraft operations.</p> <p>Massport has proposed to implement a Peak Period Monitoring System to determine, based on future growth in scheduled aircraft operations, if airline overscheduling is becoming a problem at Logan Airport. Should airline-overscheduling conditions arise, Massport will initiate Phase 1 of a phased PPP implementation process. In Phase 1 of the process, Massport will meet with individually airlines to seek voluntary schedule adjustments to avoid delays that result from overscheduling.</p>

Code	Topic 1	Topic 2	Comment	Response
11.16	Delay	Apron Alternatives	Don't inefficient and outmoded terminals contribute to delays at Logan? How much of the problem is due to aircraft waiting to get access to gates and physical constraints on the number of ticket agents and baggage handling? What is Massport's plan for addressing one of its more problematic terminals, Terminal A?	The Airside analysis evaluates delays related to inefficiencies of the airfield and does not include delays related to aircraft waiting to access gates or outmoded terminals and terminal facilities. Massport and individual airlines are currently undertaking redevelopment of the landside portion of the airport (<i>i.e.</i> , terminals, roadways, etc.). These projects are also required to undergo environmental review. For Terminal A, Delta Air Lines received environmental approval for its proposed terminal replacement project in late 1999. <i>Logan Airport's 1999 ESPR</i> (formerly GEIR) reports on cumulative impacts of Logan Airport's landside and airside operations.
11.17	Ground Transportation	Access to Logan	What are Massport's plans to handle the increased need for public transportation to the airport, once capacity is increased?	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPR</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
11.18	Regional Transportation	Regional Airports	Massport is now touting plans to increase usage of Worcester Airport. Why did Massport wait until public pressure arose for regional airports to file the bill that gives them control of this airport? Are there other options that could be pursued but due to lack of interest remain unexplored?	Massport has a long-standing relationship with the City of Worcester to aid Worcester Regional Airport in reaching its full potential, thereby improving the efficiency of the New England air transportation network. Massport assumed operational control of the Worcester Regional Airport on January 15, 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of Massport's efforts to promote increased utilization of Worcester Regional and the other regional airports.
11.19	Air Quality	NAAQS	There are concerns about the levels of increased toxic emissions from aircraft. What sort of assurance can be provided that the state's implementation plan to comply with the Federal Clean Air Act will not be jeopardized by increased air traffic? Even if the state is in technical compliance, there ought to be an estimate as to what level of increase could result from the growth in air traffic at Logan before the runway proceeds.	The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR and Appendix F. These inventories show that all Alternatives, including the No Action and Preferred Alternative, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM ₁₀) under any alternative and future year.



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 12

SENATOR HENRI S. RAUSCHENBACH

CAPE & ISLANDS DISTRICT

ROOM 421

TEL. (617) 722-1570

DISTRICT OFFICE

TEL. (508) 362-4556

HRAusche@senate.state.ma.us

SENHSR@AOL.COM

Web Page: www.capecod.net/senrauschenb

COMMITTEES:

SENATE WAYS AND MEANS

HEALTH CARE

ENERGY

April 22, 1999

Massachusetts Environmental Protection Agency
1 Winter Street
Boston MA, 02108

Dear Secretary Durand:

We, the Cape Cod Legislative Delegation, write to you in determined support of proposed runway 14/32 at Logan International Airport. The transportation needs of our districts are inexorably linked to Logan airport in much the same way as every other region in eastern Massachusetts. Efficient operation of the Boston airport has immediate and measurable impact on economics and quality of life for Cape and Islands residents. For instance, Cape Air/Nantucket Airlines, the largest independent regional server in the country, flies 150,000 passengers to and from Boston each year. Passengers include Cape and Island residents traveling on business as well as those seeking medical procedures or other services unavailable locally. Moreover, air transport is central to the success of our tourism industry, one of the main sources of our constituent's livelihoods. In all, the unique geographic realities of the Cape and Islands wed our interests to events at Logan. Too often, delays in Boston become fully manifest in local consequences. We thank you for your consideration and do urge your favorable view of this initiative.

Respectfully Submitted,

12.1

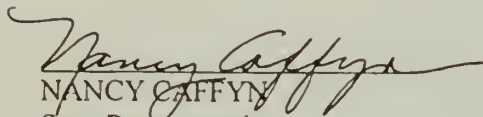
THE CAPE COD LEGISLATIVE DELEGATION



HENRI S. RAUSCHENBACH
State Senator
Cape & Islands District



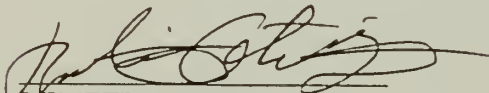
THERESE MURRAY
State Senator
Plymouth & Barnstable District



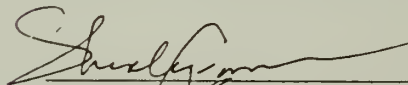
NANCY CAFFYN
State Representative
3rd Barnstable District



ERIC TURKINGTON
State Representative
Barnstable, Dukes & Nantucket



DEMETRIUS ATSALIS
State Representative
2nd Barnstable District



SHIRLEY GOMES
State Representative
4th Barnstable District



RUTH PROVOST
State Representative
Barnstable & Plymouth District



THOMAS GEORGE
State Representative
1st Barnstable District

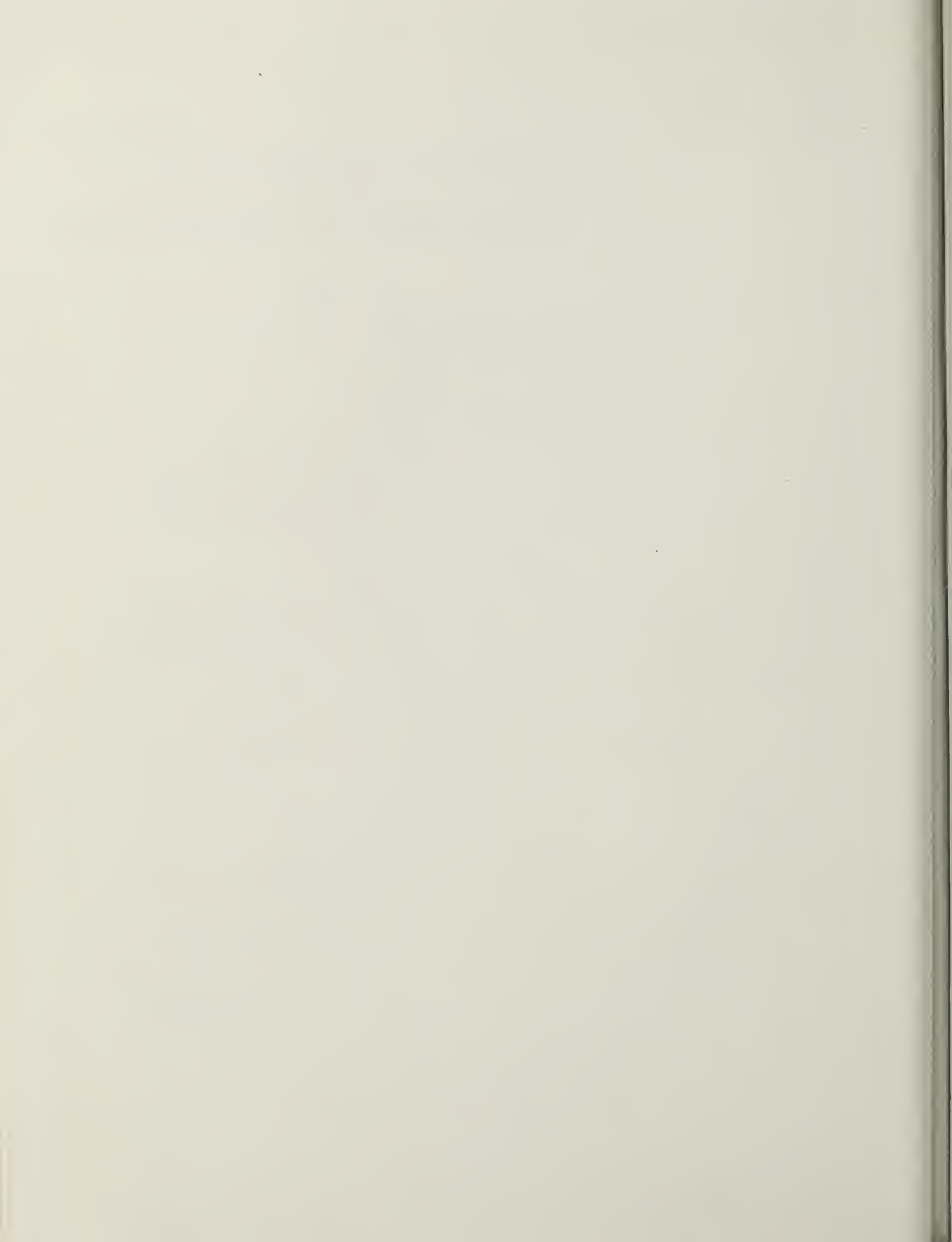
HSR/cb

Letter 12

Cape Cod Legislative Delegation

Senator Henri S. Rauschenbach

Code	Topic 1	Topic 2	Comment	Response
12.1	Purpose and Need	Delays	Efficient operation of the Boston airport has immediate and measurable impact on economics and quality of life for Cape and Islands residents. Passengers include Cape and Island residents traveling on business as well as those seeking medical procedures or other services unavailable locally. Moreover, air transport is central to the success of our tourism industry, one of the main sources of our constituent's livelihoods. Too often, delays in Boston become fully manifest in local consequences.	Comment noted.





The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

REPRESENTATIVE
ROBERT A. DELEO
19TH SUFFOLK DISTRICT
ROOM 20, STATE HOUSE

TEL. (617) 722-2410

LETTER 13

Chairman
Committee on
Bills in the Third Reading
Chairman
M.W.R.A. Legislative Caucus
Legislative Caucus on
Older Citizens Concerns
Committee Member:
Ethics

April 7, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, Massachusetts 022025

Mr. John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, Massachusetts 01803

Dear Mr. Pugsley and Mr. Silva:

As allowed by state and federal law, I submit to you comments regarding proposals put forth by the Massachusetts Port Authority and Federal Aviation Administration entitled, "Logan Airside Improvements Planning Project," in reference to proposed construction and augmentation of the General Edward Lawrence Logan Airport.

I have the distinct pleasure and honor of representing the residents of Winthrop and part of Revere in the Massachusetts House of Representatives. Both in that capacity and as a resident of Winthrop myself, I have had a keen interest in matters concerning Logan Airport for many years. From that experience as well as from a careful review of all MassPort expansion proposals, I can say unequivocally and without hesitation that if the expansion plans are carried out, it will represent the single largest environmental attack the residents of communities which neighbor Logan have ever had to endure.

The primary reason for MassPort's undertaking of this course of action is its desire to reduce delays. It goes without saying that any reduction in delays at Logan Airport would benefit not only the local economy of the Greater Boston Area, but the economy of the entire Commonwealth as well. It should be stated that those who oppose

expansion at Logan do not, in any manner, oppose either delay reduction or economic growth. We do, however, oppose the method which MassPort has chosen to remedy the current delay-prone situation.

It is the contention of the Massachusetts Port Authority that without the proposed Airside improvements, Logan Airport will continue to experience increasing delays. This is true, however, even if all of the proposed construction were to be completed, Logan would still return to its present level of delays within five (5) years. While MassPort may dispute this number within a range of a few years, it is still an undeniable fact that as demand increases, delays will increase as well. Whether they rise at a slower or faster rate is an inconsequential question because it does not speak to a long-term, viable solution. In essence, MassPort is requesting to undertake a project which will degrade the environmental status of the region, (as I will describe latter), while not adequately addressing the underlying problem. This represents environmental harm perpetrated for less than practical, let alone justifiable, reasons.

13.1

The issue of noise and air pollution has many parallels to the issue of delays in the sense that the MassPort solution again provides only temporary relief. One need look no further than those who I represent in Winthrop and Revere to see that even people who would ostensibly benefit from the construction of an East/West runway realize the folly of expansion. Even with a 35% reduction in operation over their heads, in short order the number of operations, and thus, the level of noise pollution will be back to present levels and will continue to rise in the future.

13.2

In the mean time, communities affected by operations on Runways 33 and 27 including Charlestown, Chelsea, Revere, Somerville, Cambridge, Melrose, Roxbury, South Boston, Jamaica Plain, Roslindale, West Roxbury, Brookline and East Boston would see operations more than triple. While MassPort describes these increases as a more "equitable distribution" of noise and air pollution, I believe it is only a temporary shuffling of a problem which has been conceived based on limited concepts of "distribution." Add to this equation the fact that MassPort has no quantitative data regarding the actual pollutants expelled by aircraft, and the result is an expansion proposal which is proceeding on less than justified conclusions.

13.3

This question of distribution also speaks to a larger environmental concern; namely the concept of environmental justice. Given the undeniable fact that aircraft expel pollutants, it follows that an increase in air traffic will lead to an increase in pollutants. Why then should one region of the Commonwealth be made to suffer these increases when the benefit of expansion is clearly meant for the entire Commonwealth? I urge that consideration be given to those who have endured both noise and air pollution since the airport's inception, for they have already paid for economic progress by sacrificing their health and quality of life.

13.4

As you consider the concept of environmental equity, I further urge you consider other detrimental aspects of MassPort's expansion proposals other than the construction

of a new runway. One of these proposals, which I hold in extreme contempt based on its direct affect on the communities that I represent as well as its probable detriment to the Greater Boston area at large, is the construction of a centerfield taxiway. The orientation of this proposed taxiway will require aircraft be aligned such that their idling engines face directly toward Winthrop and Revere. It is no great scientific revelation that this orientation will result in increases in the pollutants present in Winthrop and Revere air. Moreover, a secondary but no less important issue is the simple fact that this taxiway will allow Logan Airport to increase its overall operations by freeing up piers at the various terminals. As has been stated before, any increase in operations will result in an increase in pollutants.

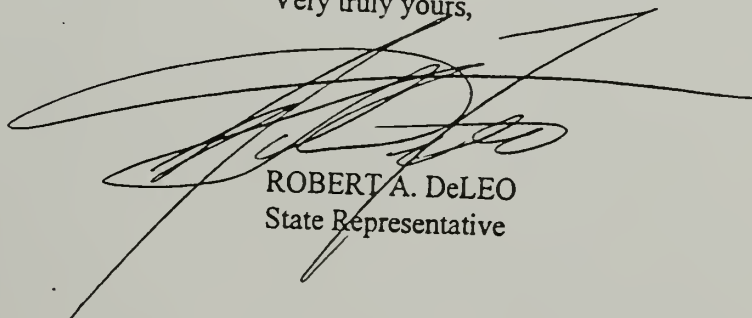
13.5

The Port Authority has also suggested that as part of its Airside Improvements it be allowed to apply to the Federal Aviation Administration to lower its minimum landing requirements. This would accomplish two goals, both of which would prove to be environmentally unsound. First, it would allow pilots to make a final landing decision at a lower altitude in inclement weather. A low decision altitude would necessarily mean that when a landing is aborted, the resulting engine power increase needed to execute a missed-approach would itself have to be initiated at a lower altitude. Put simply, when a missed approach is executed at a lower altitude, the result is more noise for the residents who live underneath the final approach pattern. Any lowering of minimums would necessarily lead to increased noise pollution in the immediate area.

13.6

In closing, let me restate my firm belief that expansion at Logan will necessarily entail increased environmental degradation and increased suffering for Logan's neighbors. Thank you for your consideration of my thoughts on this matter. Please call on me if I can be of any further assistance.

Very truly yours,



ROBERT A. DeLEO
State Representative

RAD/jce



Letter 13

MA State Representative Robert A. DeLeo

Code	Topic 1	Topic 2	Comment	Response
13.1	Purpose and Need	Delays	It is the contention of the Massachusetts Port Authority that without the proposed Airside improvements, Logan Airport will continue to experience increasing delays. This is true, however, even if all of the proposed construction were to be completed, Logan would still return to its present level of delays within five (5) years. Massport is requesting to undertake a project which will degrade the environmental status of the region, while not adequately addressing the underlying problem.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
13.2	Noise	Impacts	The issue of noise and air pollution has many parallels to the issue of delays in the sense that the Massport solution again provides only temporary relief. Even with a 35% reduction in operations over their heads, in short order the number of operations, and thus, the level of noise pollution will be back to present levels and will continue to rise in the future.	The ground noise analyses in Section 6.2.4 of the Airside Project Draft EIS/EIR lead to the opposite conclusion. For example, Table 6.2-21 of the Airside Project Draft EIS/EIR indicates that, at all seven sites examined, the reduction in exposure is greater under both the longer-term 37.5M High Fleet and 29M Low Fleet scenarios than it is under the near-term 29M Low Fleet scenario. Recent growth trends suggest the 37.5 million passenger level is now more likely to occur around 2015. (Refer to related discussion in Section 1.4.2 of the Supplemental DEIS/FEIR).
13.3	Noise	Impacts	Communities affected by operations on Runways 33 and 27 including Charlestown, Chelsea, Revere, Somerville, Cambridge, Melrose, Roxbury, South Boston, Jamaica Plain, Roslindale, West Roxbury, Brookline and East Boston would see operations more than triple. While Massport describes these increases as a more "equitable distribution" of noise and air pollution, I believe it is only a temporary shuffling of a problem which has been conceived based on limited concepts of "distribution."	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
13.4	Environmental Justice	Impacts	Given the undeniable fact that aircraft expel pollutants, it follows that an increase in air traffic will lead to an increase in pollutants. Why then should one region of the Commonwealth be made to suffer these increases when the benefit of expansion is clearly meant for the entire Commonwealth.	Section 6.4 of the Supplemental DEIS/FEIR contains a thorough analysis of air quality impacts from the Airside Project. The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.

Code	Topic 1	Topic 2	Comment	Response
13.5	Alternatives	Taxiway Improvements	The orientation of the proposed centerfield taxiway will require aircraft be aligned such that their idling engines face directly toward Winthrop and Revere. This orientation will result in increases in the pollutants present in Winthrop and Revere air. This taxiway will allow Logan Airport to increase its overall operations by freeing up piers at the various terminals. As has been stated before, any increase in operations will result in an increase in pollutants.	Refer to response to Comment 13.4. In addition, the NAAQS serve as an indicator of the acceptability of current pollutant concentrations since these standards were designed to protect human health and welfare. Dispersion modeling indicates that no alternatives violate the NAAQS.
13.6	Alternatives	Reduced Approach Minimums	The Port Authority has also suggested that as part of its Airside Improvements it be allowed to apply to the Federal Aviation Administration to lower its minimum landing requirements. It would allow pilots to make a final landing decision at a lower altitude in inclement weather. When a missed approach is executed at a lower altitude, the result is more noise for the residents who live underneath the final approach pattern. Any lowering of minimums would necessarily lead to increased noise pollution in the immediate area.	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise. For example, reducing the Runway 22L decision height to 200 feet moves the maximum noise point to approximately 3,000 feet from touchdown which is further from populated areas in East Boston than the current maximum noise point. Although categorically excluded from NEPA review, modeling of the changes in runway availability from reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result were included in the Airside Project in compliance with an earlier agreement among Massport, the FAA and the City of Boston.



The Commonwealth of Massachusetts

House of Representatives

State House, Boston 02133-1054

PAUL C. DEMAKIS
REPRESENTATIVE
8TH SUFFOLK DISTRICT
BOSTON • BROOKLINE • CAMBRIDGE
ROOM 446, STATE HOUSE
TEL. (617) 722-2460

LETTER 14

Committees on
Government Regulations
Public Service
Transportation

LORI A. JODOIN
LEGISLATIVE AIDE

April 22, 1999

Mr. Arthur Puglsey
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Re: Logan Airside Improvements Planning Project
Draft Environmental Impact Statement/Report

Dear Mr. Puglsey:

I am writing to express my strong opposition to the proposal by the Massachusetts Port Authority to construct Runway 14/32 at Logan International Airport in Boston. Additionally, because the Draft Environmental Impact Statement/Report submitted by Massport contains several serious flaws, I strongly urge the Secretary to reject the DEIS/DEIR as inadequate and to require Massport to submit a new DEIS/DEIR.

1. Massport's delay projections are unreliable and appear to vastly overstate the extent of delays at Logan.

14.1

Massport's delay projections give the appearance of having been created to justify the construction of Runway 14/32. First, Massport apparently chose to develop its own model for estimating delays at Logan rather than relying on models used to estimate delays at other airports in the United States. There is inadequate discussion in the DEIS/DEIR on how its model were selected and developed.

Moreover, Massport uses 1993 as a base year, when delays were at a peak. Federal Aviation Administration data shows an 18% reduction in delays since that time. Additionally, Massport's model uses hourly weather observations from 1981-1990. Furthermore, Massport's delay calculations do not differentiate between the various causes of delays, including, in addition to delays caused by northwest wind conditions, delays caused by severe weather, the airlines, and delays at other airports.

Massport should be required to produce actual and current delay data derived from a universally accepted source such as the FAA. If Massport is permitted to use its own model to estimate delays, it should be required: 1) to explain how its model was selected and developed; 2) to use 1998 as a base year; 3) to use an updated 10-year average of hourly weather observation; and 4) to isolate delays caused by northwest wind conditions from delays from other causes.

14.1

2. The DEIS/DEIR does not adequately consider alternatives to the construction of Runway 14/32.

14.2

The DEIS/DEIR does not consider alternatives to the construction of Runway 14/32, including expanded use of Hanscom Field, especially for small aircraft, and construction of a second airport. It gives only superficial consideration to peak period pricing of landing fees. Massport should be required to consider these alternatives before being allowed to proceed with the construction of Runway 14/32.

3. The construction of Runway 14/32 is a short-term, "band-aid" solution to the problem of delays at Logan. Massport has no plan for dealing with long-term growth.

14.3

It appears that the construction of Runway 14/32 may reduce delays at Logan by as little as 20 percent. Moreover, according to Massport's own projections, even with the construction of Runway 14/32, delays will be back to current levels by 2005.

The DEIS/DEIR provides no plan for dealing with long-term growth at Logan and the resulting increase in delays. Additionally, it does not provide a comprehensive analysis of ground access, the parking freeze, and terminal capacity and how these critical components will affect increases in passengers and operations at Logan.

Massport should be required to extend the planning period from 2010 to 2020 with accompanying revisions in projected levels of activity and impact. Massport should be required to develop a detailed plan to shift most future growth in air traffic and passengers away from Logan. This plan should include specific goals and measures, including a major expansion of service and capacity at other airports in the region.

4. Massport cannot guarantee that Runway 14/32 will be unidirectional.

14.4

Massport has no legal authority to guarantee that Runway 14/32 will be unidirectional. Accordingly, Massport should be required to provide a detailed analysis of all impacts of Runway 14/32 based on the assumption it will be bi-directional.

5. There is inadequate mitigation for the severe environmental impacts the construction of Runway 14/32 will have on Logan's neighbors.

14.5

The construction of Runway 14/32 will result in a doubling or tripling of flights over a wide swath of metropolitan Boston. Massport offers no mitigation, such as soundproofing, to the vast majority of residents who will be affected by the increased noise caused by the new runway. Soundproofing is offered only to a small number of residents in very close proximity to Logan. Massport should be required to develop additional mitigation measures to reduce the noise impacts on the thousands of other residents who will be impacted by the new runway.

In summary, Runway 14/32 is a short-term, band-aid solution to an exaggerated problem. Its actual purpose appears to be to stimulate growth at Logan rather than reduce delays. It will result in severe negative impacts, especially a dramatic increase in noise, on many communities in and around Boston. The mitigation proposed by Massport is insufficient to reduce these impacts. Moreover, Massport has no long-term plan to address future increases in operations and passengers at Logan.

For all the reasons stated herein, Massport should not be permitted to proceed with the construction of Runway 14/32. The Secretary should reject the DEIS/DEIR as inadequate and require Massport to submit a new DEIS/DEIR that addresses the concerns raised in this letter.

Thank you for your consideration.

Sincerely,

Paul C. Demakis

Paul C. Demakis
State Representative
8th Suffolk District

Letter 14

MA State Representative Paul C. Demakis

Code	Topic 1	Topic 2	Comment	Response
14.1	Delay	Model	<p>Massport's delay projections are unreliable and appear to vastly overstate the extent of delays at Logan.</p> <p>Massport should be required to produce actual and current delay data derived from a universally accepted source such as the FAA. If Massport is permitted to use its own model to estimate delays, it should be required: 1) to explain how its model was selected and developed; 2) to use 1998 as a base year; 3) to use an updated 10-year average of hourly weather observation; and 4) to isolate delays caused by northwest wind conditions from delays from other causes.</p>	<p>Sections 1.6 and 1.8 of the Supplemental DEIS/FEIR describe FAA and U.S. DOT measures of delay and their limitations, including historical data on delays at Logan Airport and other major United States airports, and discusses the estimation and modeling of flight delays. Regardless of the delay measure used, Logan Airport has consistently been one of the most delayed airports in the nation, ranking sixth in total delays and third in arrival delays in 1998. Historically, FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. In fact, delayed flights at Logan Airport, as measured by the FAA, increased by 30 percent in 1998. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994 and now Logan Airport is the third most delayed airport in the United States in terms of arriving flights. Because the FAA and U.S. DOT delay statistics only record historical delays, the FAA requires delay modeling when evaluating the future delay reduction benefits of airport capital improvements. The methodology used for the Airside Project provides a consistent and systematic estimate of flight delays caused by constraints at Logan Airport. The analysis based on this methodology indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels.</p> <p>Consistent with the request made by EOE in its Certificate, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p> <p>The methodology used for the Airside Project provides a consistent and systematic estimate of flight delays caused by constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The analysis based on this methodology indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels.</p> <p>Comparative analysis of 1981 to 1990 weather with 1989 to 1998 weather identified no significant differences in statistical properties.</p> <p>Appendix I of the Airside Project Draft EIS/EIR contains a case study of delays under northwest wind conditions. Section 4.6 of the Supplemental DEIS/FEIR also presents information on delays under northwest wind conditions and includes an analysis of northwest wind delays in 1998.</p>

Code	Topic 1	Topic 2	Comment	Response
14.2	Alternatives	Runway 14/32	The DEIS/DEIR does not adequately consider alternatives to the construction of Runway 14/32. Massport should be required to consider [Hanscom Field, construction of a second major airport and peak period pricing] before being allowed to proceed with the construction of Runway 14/32.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.</p> <p>Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.</p> <p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
14.3	Analysis Assumptions	Planning Period	The construction of Runway 14/32 is a short-term, "band-aid" solution to the problem of delays at Logan. Massport has no plan for dealing with long-term growth. Massport should be required to extend the planning period from 2010 to 2020 with accompanying revisions in projected levels of activity and impact. Massport should be required to develop a detailed plan to shift most future growth in air traffic and passengers away from Logan. This plan should include specific goals and measures, including a major expansion of service and capacity at other airports in the region.	<p>An expanded and updated discussion of the regional alternatives is presented in Chapter 2 of the Supplemental DEIS/FEIR. Massport supports all the planned improvement projects that will enhance the attractiveness of the regional airports as alternatives to Logan Airport. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a description of the upcoming New England Airports System Study.</p> <p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>
14.4	Alternatives	Runway 14/32	Massport cannot guarantee that Runway 14/32 will be unidirectional. Massport should be required to provide a detailed analysis of all impacts of Runway 14/32 based on the assumption it will be bi-directional.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>

Code	Topic 1	Topic 2	Comment	Response
14.5	Noise	Mitigation	There is inadequate mitigation for the severe environmental impacts the construction of Runway 14/32 will have on Logan's neighbors. Massport should be required to develop additional mitigation measures to reduce the noise impacts on the thousands of other residents who will be impacted by the new runway.	<p>Chapter 8 of the Supplemental DEIS/FEIR summarizes Massport's proposed project-specific mitigation program associated with the Preferred Alternative including:</p> <p>Runway 14/32 would be designed, constructed, and operated to handle over-water operations only (unidirectional). Massport would seek to construct Runway 14/32 to reflect unidirectional use.</p> <p>To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the <i>Logan Airport 1999 ESPR</i>. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.</p> <p>During the construction period an extensive array of traffic, air quality and noise mitigation measures will be employed to mitigate temporary construction impacts.</p> <p>A PRAS monitoring system to gather data and report on the actual achievement of PRAS. The objective of this system is to improve achievement of the PRAS goals and to provide a broader platform for disseminating of the monitoring results.</p>



The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

CHRISTOPHER G. FALLON
STATE REPRESENTATIVE
36TH MIDDLESEX DISTRICT

E-Mail
Rep.ChristopherFallon@state.ma.us

ROOM 130, STATE HOUSE
TEL (617) 722-2396
FAX (617) 722-2819

KEVIN J. DUFFY
CHIEF OF STAFF

LETTER 15

ASSISTANT MAJORITY LEADER

Committees:
Judiciary
Rules

Website

<http://www.repfallon.org>

480 MAIN STREET, MALDEN, MA

TEL (781) 321-5553

FAX (781) 321-5553

JACK V. DEMIROJIAN
SENIOR CITIZEN LIAISON

April 22, 1999

Robert Durand
Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOEA # 10458
100 Cambridge Street, 20th Floor
Boston MA 02202


Dear Secretary Durand:

I am writing to offer my comments on the proposed runway expansion for Logan Airport. The Logan Airside Improvements Planning Project, (EOEA # 10458), includes proposals to construct a new 5,000 foot runway, (Runway 14/32), to build a centerfield taxiway, and to lower arrival altitude minimums at the existing General Edward Logan Airport in Boston.

Before any construction can begin however, Massport is required to file its Environmental Impact Statement and Environmental Impact Report for approval by the Executive Office of Environmental Affairs in accordance with the Massachusetts Environmental Policy Act. Simply put, I believe that the studies are inadequate regarding the possible effects of these projects. I feel that Massport has taken a "band-aid" approach that does not begin to address the actual problems that Logan is experiencing and will continue to experience for the next twenty years.

In closing, I wish to express my strong opposition to the proposed Logan Airside Improvements Project and I would urge you to reject the Draft EIS/EIR.

Thank you and if I can provide any additional information please do not hesitate to contact me.

Sincerely,

Christopher G. Fallon
State Representative
Assistant Majority Leader

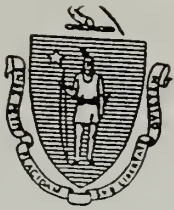
15.1



Letter 15

MA State Representative Christopher G. Fallon

Code	Topic 1	Topic 2	Comment	Response
15.1	Analysis Assumptions	Planning Period	I believe that the studies are inadequate regarding the possible effects of these projects. I feel that Massport has taken a 'band-aid' approach that does not begin to address the actual problems that Logan is experiencing and will continue to experience for the next twenty years.	<p>The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i>, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i>. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i>, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.</p> <p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.</p>



Kevin W. Fitzgerald
State Representative
Assistant Majority Whip
Floor Division Leader

The General Court of Massachusetts
Room 527A, State House
Boston, MA 02133-1054
Telephone (617) 722-2250
Fax (617) 722-2706

LETTER 16

15th Suffolk District
Mission Hill / Jamaica Plain / Roxbury

April 16, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley EOE No. #10458
100 Cambridge Street - 20 th Floor
Boston, MA 02202

Dear Secretary Durand,

My comments to the EIR-Logan Airside Improvements Plan EOE No. #10458 are as follows: I am opposed to this plan. I have grave concerns about increased air traffic, noise and pollution which would result from this shortsighted proposal. EOE No. #10458 should find significant planning deficiencies in Massport's Draft Environmental Impact Statement (DEIS), and require that it be withdrawn.

Logan Airport was constructed in a residential neighborhood. Massport should not be allowed to take a segmented approach to Logan's development. Landside improvement projects (which accommodate ground passenger handling) and airside improvement projects (which accommodate aircraft handling) are interrelated. Both generate increased traffic and pollution. Both must be included in any planning document. Massport must also accept ultimate responsibility for controlling passenger and cargo growth. They must not simply be presented as immutable forces of nature.

16.1

16.2

The EOE No. #10458 and the FAA should require Massport to change the base year in its calculations to calendar year 1998 and revise all presentations in the DEIS/DEIR to reflect that. They should also extend the planning period from 2010 to 2020 and revise all the projected levels of activity accordingly. Outdated whether data should be replaced with current information. Massport should use the FAA's definition of delays in their work. The DEIS/DEIR should be republished to reflect all these changes.

16.3

The alleged benefits of this plan focus narrowly on the short term, namely a very small decrease in passenger delays. The plan sidesteps the long-term consequences of increased air traffic over Jamaica Plain, Roxbury and all of the surrounding neighborhoods. Massport also does not address the ultimate questions of the limits to

16.4

16.5

growth at Logan. What is the end limit to the number of take offs and landings that the airport can handle? How many passengers can the airport process? When do they expect to reach these limits, or is the airport going to continually expand until it further disrupts East Boston? What will this mean for the quality of life of all Boston neighborhoods?

We need to explore a regional, comprehensive transportation plan. Such a plan must include consideration of another location for a second airport, as well as steering air traffic to Hanscom and Worcester. As a constituent wrote, we also need to divert air travelers to the new Amtrack high speed train between Boston, New York and Washington D.C. We also need to build the North South rail Link between North and South Stations. Perhaps the increased use of video conferencing can replace the need for some business travelers to fly into Logan.

16.6


Massport needs to study the reasons for the perceived increase in demand for air traffic and find more creative alternatives besides building another runway. Perhaps Massport should take a page out of the book of the electric utility companies. Some of them have found that it is more desirable to give customers discounts on energy efficient light fixtures and thereby reduce demand, than it would be to invest in building more plants to increase capacity.

16.7

There are many more problems with the DEIS regarding noise, environmental impacts, construction impacts, endangered species, soundproofing, flight tracks, night time operations and etc. Without going into more detail, I believe that the case has already been made that the DEIS must be withdrawn and rewritten. It should answer each of the specific problems and questions brought up in the Community Advisory Committee review.

Thank you for your attention in this very important matter. If you have any questions regarding this testimony, please contact me at my office at (617) 722-2250.

Sincerely,


Kevin W. Fitzgerald
State Representative

Letter 16

MA State Representative Kevin Fitzgerald

Code	Topic 1	Topic 2	Comment	Response
16.1	Environmental Review Process	MEPA	Massport should not be allowed to take a segmented approach to Logan's development. Landside improvement projects (which accommodate ground passenger handling) and airside improvement projects (which accommodate aircraft handling) are interrelated. Both generate increased traffic and pollution. Both must be included in any planning document.	<p>The purpose of the Airside Improvements Planning Project is to reduce current and projected levels of airfield congestion and delay and to enhance the safety of aircraft operations at Logan. Massport's proposed landside improvements are planned to enhance the efficiency of passenger processing, and include terminal modernization, as well as roadway, parking and service area improvements. The landside projects will not affect the design or implementation of the Airside Project, which has independent utility, nor will the Airside Project improvements affect the design or implementation of any of the landside projects. All airside and landside projects, where required, will continue to be the subject of separate comprehensive environmental analysis by project proponents in accordance with federal and state regulations.</p> <p>As expressed in the May 7, 1999 EOECA Certificate, Massport's ESPR (formerly GEIR) process "is expected provide a big picture cumulative impact analysis of Logan operations, impacts and mitigation. It complements the project-specific EIRs," such as this one for the Airside Improvements, "helps to focus the review process of individual EIRs, and ensures that segmented project review does not occur in the context of MEPA review at Logan Airport."</p>
16.2	Alternatives	Operational Restrictions	Massport must also accept ultimate responsibility for controlling passenger and cargo growth.	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.

Code	Topic 1	Topic 2	Comment	Response
16.3	Analysis Assumptions	Base year	The EOEA and the FAA should require Massport to change the base year in its calculations to calendar year 1998 and revise all presentations in the DEIS/DEIR to reflect that. They should also extend the planning period from 2010 to 2020 and revise all the projected levels of activity accordingly. Outdated weather data should be replaced with current information. Massport should use the FAA's definition of delays.	<p>The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historic perspective to the delay problem at Logan Airport and for use in model calibration. Section 4.6 of the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. It should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project is a comparison of the Preferred Alternative to the No Action Alternative.</p> <p>Delay and environmental impacts of the Airside Project were evaluated under a broad range of future operating conditions at Logan Airport. Current air traffic trends at Logan Airport, as described in the Supplemental DEIS/FEIR, indicate that the 37.5 M scenario level may not be reached until 2015, and the 45 M level may not occur until 2020 or beyond. The planning horizon considered in the airside analysis therefore extends well beyond ten years.</p> <p>Comparative analysis of 1981 to 1990 weather with 1989 to 1998 weather identifies no significant differences in statistical properties.</p> <p>Section 4.4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays. It includes a description of FAA and DOT delay measures, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data on delays at Logan Airport and other major United States airports. The FAA and DOT delay statistics only record (imprecisely) historical delays; they cannot predict future delays.</p>
16.4	Noise	Impacts	The plan sidesteps the long-term consequences of increased air traffic over Jamaica Plain, Roxbury and all of the surrounding neighborhoods.	<p>The Supplemental DEIS/FEIR indicates that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The PRAS goals were established based on a thorough public participation process in response to community noise concerns.</p> <p>The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts.</p>
16.5	Cumulative Impacts	Master Plan	Massport also does not address the ultimate questions of the limits to growth at Logan. What is the end limit to the number of take offs and landings that the airport can handle? How many passengers can the airport process? When do they expect to reach these limits?	<p>Federal constitutional provisions (preemption, commerce clause, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the federal Airport Improvement Program grants which Massport receives restrict Massport's ability to control the number of aircraft operations at Logan Airport.</p> <p>Refer also to response to Comment 16.3.</p>

Code	Topic 1	Topic 2	Comment	Response
16.6	Regional Transportation	Regional Airports	We need to explore a regional, comprehensive transportation plan. Such a plan must include consideration of another location for a second airport, as well as steering air traffic to Hanscom and Worcester. As a constituent wrote, we also need to divert air travelers to the new Amtrak high speed train between Boston, New York and Washington D.C. We also need to build the North South rail Link between North and South Stations. Perhaps the increased use of video conferencing can replace the need for some business travelers to fly into Logan.	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester Airports.</p> <p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field, consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.</p> <p>Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester Airport, T.F. Green/Providence Airport and Worcester Regional Airport, preclude the need for a second major airport.</p> <p>Massport holds a seat on the Citizens Advisory Committee (CAC) of the MBTA's North-South Rail Link Project. The CAC met monthly and provided a forum for Massport and the MBTA to coordinate their ridership estimates and assessments of the relationship of the North-South Rail Link on airport access and airport usage. To date, the North-South Rail Link Project has not received funding and will not impact Logan Airport over the study time frame. Should the North-South Rail Link be constructed, resulting passenger diversions from Logan Airport to rail could reach 46,700 annual passengers, or less than one-half of one percent of Logan Airport's total annual traffic. The acceptance of videoconferencing and other means of telecommunications by businesses as a substitute for air travel is largely dependent upon the quality of the available technology and private sector decisions outside the authority of FAA and Massport. Massport encourages such initiatives from state government and others.</p>
16.7	Purpose and Need	Delays	Massport needs to study the reasons for the perceived increase in demand for air traffic and find more creative alternatives besides building another runway.	Refer to response to Comment 16. 5 and 16.6



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

LETTER 17

PATRICIA JEHLLEN

30TH MIDDLESEX DISTRICT
ROOM 275, STATE HOUSE

OFFICE TEL. (617) 722-2676

FAX (617) 722-2048

E-Mail: Rep.PatriciaJehlen@house.state.ma.us

ADMINISTRATIVE ASSISTANT
MAGGI CARFIELD

67 DANE STREET

SOMERVILLE, MA 02143

HOME TEL. (617) 866-9479

March 29, 1999

Robert Durand, Secretary
MEPA Unit - Executive Office of Environmental Affairs
100 Cambridge St., 20th floor
Boston MA 02202
attn: Arthur Pugsley

Dear Secretary Durand,

This letter is in brief response to the draft Environmental Impact Report for the proposed Airside Improvements Project for Logan Airport.

People in Somerville are already disturbed by the noise of airplanes approaching or leaving Logan Airport, and are worried about the possible tripling of overflights which may take place.

My view, after listening to presentations by proponents and opponents of the proposed Runway 14-32, is that the main result of that runway will be to increase traffic. Even with high-speed rail about to open, there will probably be an increased demand by people wanting to fly into Boston. My understanding is that this increase could be accommodated by changing from smaller to larger airplanes to carry the traffic. This would lead to less pollution, less noise, and fewer delays, without increasing the number of flights as much, although if all the planes are larger, they can approach the airport in closer succession.

17.1

So, you should be exploring ways to discourage smaller aircraft. Building Runway 14-32, which could be used only by such planes, would go in the opposite direction, encouraging the scheduling of flights accommodating fewer than 50 passengers. In other words, if you build it, they -- small aircraft -- will come.

17.2

I urge MassPort to explore the many cheaper and more environmentally sound ways to increase the number of passengers using Logan. I also urge you to consider plans for regional solutions, including other airports and rail.

17.3

Finally, delays at Logan result not only from delayed flights but from tunnel traffic. Better mass transit access, or diversion of some flights to Hanscom or Worcester, could help resolve this problem.

17.4

On behalf of my many constituents who have contacted me on this issue, I strongly oppose building 14-32 and thereby increasing air traffic dramatically over our city.

Sincerely ,

(Patricia Jehl)

Letter 17

MA State Representative Patricia Jehlen

Code	Topic 1	Topic 2	Comment	Response
17.1	Purpose and Need	Delays	Increased demand could be accommodated by changing from smaller to larger airplanes to carry the traffic. This would lead to less pollution, less noise, and fewer delays, without increasing the number of flights.	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.
17.2	Alternatives	Runway 14/32	Building Runway 14-32 would encourage the scheduling of flights accommodating fewer than 50 passengers.	Refer to Section 8.5 of the Supplemental DEIS/FEIR for a discussion of ways the unidirectional restriction can be enforced. Small aircraft can be accommodated on any runway configuration at Logan Airport. Runway 14/32 would simply allow Logan Airport to maintain its full VFR capacity in northwest wind conditions and will not provide a new capability to accommodate small aircraft, nor should it encourage additional investment in this type of equipment. Since Aviation Deregulation in 1979, airlines have been free to select their own markets, schedules and equipment without Federal, State or local intervention. Major factors in airline competition are frequency of service and number of markets served. Airlines schedule flights and select aircraft types based on profitability, not runway characteristics at a single airport in the network.

Code	Topic 1	Topic 2	Comment	Response
17.3	Regional Transportation	Regional Airports, Passenger Rail	... Massport should explore the many cheaper and more environmentally sound ways to increase the number of passengers using Logan. I also urge you to consider plans for regional solutions, including other airports and rail.	<p>The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i>, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i>. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i>, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.</p> <p>The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.</p> <p>Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>
17.4	Ground Transportation	Access to Logan Airport	Delays at Logan result not only from delayed flights but from tunnel traffic. Better mass transit access, or diversion of some flights to Hanscom or Worcester, could help resolve this problem.	<p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPR</i> (previously GEIR) and its subsequent EDR (Annual Updates).</p> <p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 18

SENATOR STEPHEN F. LYNCH
FIRST SUFFOLK DISTRICT
STATE HOUSE, ROOM 424
TEL. (617) 722-1150
FAX (617) 722-2191

COMMITTEES:
COMMERCE AND LABOR
(CHAIRMAN)

WAYS AND MEANS
EDUCATION
PUBLIC SERVICE
COUNTIES
ETHICS

April 12, 1999

Secretary Robert A. Durand
Executive Office of Environmental Affairs
Attention: MEPA Unit, Arthur Pugsley, EOEa No. 10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: MEPA Project Number: EOEa No. 10458

Dear Secretary Durand:

I would like to be recorded in opposition to the proposed Logan Airside Improvements Planning Project as outlined in the Draft Environmental Impact Statement/Report by the Massachusetts Port Authority (Massport) and the Federal Aviation Administration (FAA). This report outlines the proposal plans to build a new runway 14/32, and to construct and operate a new Centerfield Taxiway.

As the State Senator for the First Suffolk district, I am ever aware of the health and safety hazards that face the impacted communities below the flight paths. I appreciate the opportunity to comment on this proposal.

Safety Issues

The flight paths of Logan Airport already present serious safety concerns for the residents of its surrounding communities. Not long ago, the Dorchester community experienced the crash of an airplane on Lonsdale Street. Several homes were destroyed, the pilot killed, and a permanent feeling of unease has remained. In addition, another incident occurred in the Cedar Grove section of Dorchester when an engine fell off an aircraft and landed near a development for the elderly. Incidents such as these remind the neighborhoods of Boston of the need for reducing the dangers presented by overhead aircraft.

18.1

April 12, 1999

PAGE TWO MEPA Project Number: EOEa No. 10458

Health Concerns

In addition to the dangerous risk of crashes, the neighboring communities of Logan Airport must also contend with air and noise pollution. We recently met with physicians and public health officials of the South Boston Health Center regarding relentless noise associated with over-head aircraft which they believe adversely impacts the health of local residents.

Although noise pollution has a major effect on the lives of the people neighboring the airport, it is not the only health risk involved. Massport has offered no meaningful attempt to measure the level of air pollution associated with the jet fuel emissions.

Increased air traffic will lead to more air pollution and various upper respiratory problems including asthma. The neighborhoods of South Boston, Dorchester and Roxbury all contend with unusually high incidents of these types of health problems. Recently, I filed legislation that calls for the study of health impacts by Logan Airport on surrounding communities. Senate Docket Number 1878, *An Act Relative to a Public Health Study of the Impacts of Logan International Airport* would direct the Bureau of Environmental Health Assessment of the Department of Public Health to conduct an environmental risk assessment of health impacts of the airport on the communities. More specifically, it would examine the incidences of respiratory disease and cancer in these communities, as well as other health problems. Until we can ascertain the affects of the airport on its neighboring communities, I believe that it is dangerous to allow any further expansion at Logan. 18.2

Traffic Issues

Obviously, the further development of Logan International Airport will attract an increased number of vehicular traffic to our neighborhood streets. While specific truck routes have been created to divert trucks from our neighborhood streets, passenger cars have continued to use these residential communities as a cut-through to the highway system. To date there has not been a traffic study or a mitigation plan proposed. This lack of acknowledgement of the traffic impact of Logan Airport on the neighborhoods is shortsighted and disrespectful. 18.3

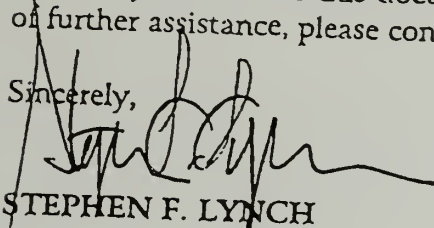
We know Logan Airport is intrusive, noisy and relentlessly disruptive of our environment and health. Massport should seriously consider the resources of regional airports before looking to expand Logan. 18.4

April 12, 1999

PAGE THREE MEPA Project Number: EOEA No. 10458

Once again, I thank you for the opportunity to comment on this matter. I urge the MEPA Unit of the Executive Office of Environmental Affairs to keep these issues in mind as you consider this document. Thank you for your consideration. If I can be of further assistance, please contact my office.

Sincerely,



STEPHEN F. LYNCH
State Senator

SFL/cp

Letter 18

MA State Senator Stephen F. Lynch

Code	Topic 1	Topic 2	Comment	Response
18.1	Alternatives	Runway Use	The flight paths of Logan Airport already present serious safety concerns for the residents of its surrounding communities. [There is a] need for reducing the dangers presented by overhead aircraft.	The first goal of the FAA and Massport is always to provide safe air transportation. Logan Airport has a tightly controlled system of flight tracks and procedures to prevent aircraft accidents. Runway 14/32 and the other proposed Airside improvements are designed to enhance safety and efficiency of traffic operations in the air and on the ground. The runway will segregate smaller aircraft and reduce congestion during northwest wind conditions, reducing the possibility of mistakes and potential for accidents.
18.2	Public Health	Health Effects	Increased air traffic will lead to more air pollution and various upper respiratory problems including asthma. The neighborhoods of South Boston, Dorchester and Roxbury all contend with unusually high incidents of these types of health problems. Until we can ascertain the affects of the airport on its neighboring communities, I believe that it is dangerous to allow any further expansion at Logan.	Public health is discussed in Section 6.8 of the Supplemental DEIS/FEIR. Dispersion modeling for the air quality analysis indicates no violation of the NAAQS, which were designed to protect human health and welfare.
18.3	Ground Transportation	Access to Logan	Further development of Logan International Airport will attract an increased number of vehicular traffic to our neighborhood streets. Passenger cars have continued to use these residential communities as a cut-through to the highway system. To date there has not been a traffic study or a mitigation plan proposed.	The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.
18.4	Regional Transportation	Regional Airports	Massport should seriously consider the resources of regional airports before looking to expand Logan.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.



The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

REPRESENTATIVE
LIZ MALIA

11TH SUFFOLK DISTRICT

ROOM 540, STATE HOUSE

TEL. (617) 722-2090

FAX (617) 722-2706

Rep.LizMalia@state.ma.us

LETTER 19

April 22, 1999

Committee on:
SCIENCE and TECHNOLOGY
PERSONNEL and ADMINISTRATION
COUNTIES

LEGISLATIVE AIDE
KAREN VAN KOOT

Karen.VanKoot@state.ma.us

Arthur Pugsley
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston MA 02202

Dear Mr. Pugsley;

I am writing to voice my strong opposition to the Massport plans to build a new runway (Runway 14/42) and redesign taxiways at Logan Airport. I am requesting that MEPA deny approval of the draft Environmental Impact Statement (EIS) submitted by Massport to implement their proposal.

As the State Representative for parts of Jamaica Plain, Dorchester, Roslindale and Roxbury, I urge you to take into consideration the fact that much of the data used by Massport to justify their request is questionable in its accuracy, and in fact raises many more questions than it answers.

The transportation needs of New England and the greater Boston area are extremely complex and should be addressed in a comprehensive, regional manner. Although well intentioned, Massport's new runway proposal falls far short of offering any substantial solutions to those needs. The addition of a new runway at Logan will only encourage the expansion of an already too large airport in a too dense urban neighborhood. It is impossible to believe that resulting noise and air quality issues won't have a disastrous effect on residents in the immediate and surrounding communities. I am also alarmed that no effort was made in this report to measure the impact of increased road and ground traffic.

19.1

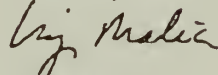
19.2

Unfortunately, a major opportunity to explore specifics of other potential solutions to our air and general transportation needs was lost in rushing this study to completion. As an elected official with an extremely diverse district to represent, I believe it would be irresponsible of me to not oppose Massport's request until we have all had an opportunity

to both study alternatives and answer the many health and public safety questions that have been raised.

I appreciate the opportunity to express my concerns and thoughts in this matter. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Liz Malia".

LIZ MALIA

State Representative

Letter 19

MA State Representative Liz Malia

Code	Topic 1	Topic 2	Comment	Response
19.1	Alternatives	Runway 14/32	The addition of a new runway at Logan will only encourage the expansion of an already too large airport in a too dense urban neighborhood. It is impossible to believe that resulting noise and air quality issues won't have a disastrous effect on residents in the immediate and surrounding communities.	<p>Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively.</p> <p>Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.</p> <p>The emissions inventories for future conditions and alternatives are contained in Section 6.4 of the Supplemental DEIS/FEIR. These inventories show that all Alternatives, including the Build and No-Build Alternatives, are well within acceptable criteria. In addition, dispersion modeling indicates no violation of the NAAQS for the pollutants analyzed (CO, NO and PM₁₀) under any alternative and future year.</p>
19.2	Ground Transportation	Access to Logan	I am also alarmed that no effort was made in this report to measure the impact of increased road and ground traffic.	<p>The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.</p>



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 20

SENATOR MICHAEL W. MORRISSEY
NORFOLK AND PLYMOUTH DISTRICT
ROOM 413D
TEL. 617-722-1494
FAX 617-722-1055
E-Mail: MMorrisse@senate.state.ma.us

COMMITTEES:
GOVERNMENT REGULATIONS
(CHAIR)
WAYS AND MEANS
NATURAL RESOURCES AND
AGRICULTURE
TRANSPORTATION
REDISTRICTING (VICE-CHAIR)

April 14, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley- EOEa No. 10458
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Dear Mr. Pugsley:

I would like to take this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Logan Airside Improvements Planning Project. After reviewing the DEIR and attending various meetings on this matter I am writing to oppose the proposed runway 14/32 at Logan Airport.

I have reviewed the DEIR and Draft Environmental Impact Statement (DEIS) for the Logan Airside Improvements Planning Project and it is an incomplete document that needs to be re-drafted. The data and studies used to project the necessity of the new runway were out-of-date, using 1993 as a base year and therefore unreflective of the current situation. For instance, the Airside delay model (DELAYSIM) used hourly weather observations from 1981-1990. Due to the effects of El Nino and La Nina the weather patterns have changed significantly within the last five years and this information is no longer relevant. The study should construct and use a new 10-year average. There are contradictions in the calculations of delays as well. Massport developed their own model for estimating delay, rather than using the Federal Aviation Administration (FAA)-approved SIMMOD model. The FAA shows the delay situation at Logan has improved by decreasing by 36% between the years 1993 and 1997.

The DEIR does not include studies of other sources of delay that plague Logan Airport. The problems of parking and ground access are critical issues to getting people in and out of Logan quickly and efficiently. These issues will be even more crucial with the forecasted dramatic increases in passengers and operations at Logan. Terminal capacity and the baggage claim areas are also topics of concern. These areas have been improved, but with the projected increase in passengers there will be a need for more improvements down the road. The previously mentioned issues should have been studied as well, to see how much of an impact on

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20.2

20.3

delays they actually have. When addressing the problem of delays, the whole operation of Logan needs to be taken into consideration, not just the weather.

The DEIR also failed to include studies of alternative plans in addition to the proposed runway 14/32. There is no mention of the impact of using several regional airports to relieve some of the traffic flowing into Logan Airport from across the state. Many citizens from the central and southeastern parts of the state drive hours to get to Logan when there are airports with the potential to be competent air service providers within a half-hour or less. In Worcester, Hyannis, and New Bedford there are airstrips, that with improvements could provide the state with the regional air transportation it needs. However, the DEIR did not mention these regional airports and the impact they would have on Logan, particularly in the area of delays.

20.4

There have been improvements in regard to delay at Logan Airport. As mentioned earlier there has been a 36% decrease in delays from 1993 to 1997. The FAA has further reported that 1998 delays were 18% lower than 1993 levels, this information was not included in the DEIR. These reductions in delays occurred without the implementation of any airside improvements. The thought of constructing the new runway to reduce weather-related delays actually has the effect of increasing the all-weather capacity of the airport; thus allowing for additional aircraft operations. Massport officials have said this is a short-term solution. The DEIR makes no long-term analysis of growth and delay problems at Logan, ending its analysis at the year 2010. By that date, with the new runway, and use of its proposed regional alternatives, Massport still projects delays to have increased by 39,000 hours annually. The Commonwealth needs a long-term solution we can not go through this same situation ten years down the road; we need to plan for the future of the Commonwealth now.

20.5

20.6

My constituents have their own concerns about the construction of the new runway. Several people were outraged that taxpayers dollars were funding the publicity campaign in favor of the new runway, when most people are opposed. Many people feel that Massport is resorting to a divide and conquer strategy when dealing with surrounding communities. By stressing to communities that they will see a reduction and pitting them against the other communities that will see an increase, in order to gather enough support for the proposal to pass.

Other constituents do not trust Massport and see this runway as a way to increase the number of aircraft coming and going at Logan and ultimately increasing the noise over their neighborhoods. This is in no way a case of "not in my backyard"; these people have lived with Logan for over 23 years, they simply can not take any more. Massport has talked about soundproofing the areas that receive the most noise pollution. Did they think about how many homes that will include? This does not seem feasible and even if it is, this does not resolve the problem when people want to use their backyards or when the windows are open.

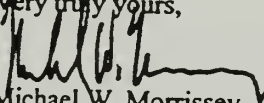
20.7

As you can see there are many unresolved issues pertaining to the proposed runway 14/32 at Logan Airport. Many things were left out of Massport's DEIR that are pertinent to the discussion of the new runway. Citizens of the Commonwealth deserve all the facts since the decision will be effecting their daily lives. There was not enough exploration into supporting the regional airports and making them alternate locations for air service. We should spread the access and the noise that goes with it, around the region, not just around Boston. This will solve several problems at once. The delay and congestion issues will be improved by diverting travelers to other airports. The residents surrounding the airport will get a slight break with a reduction in noise from aircraft flying over their homes. In addition, travelers that live far from Boston will have closer alternatives with possible cheaper prices.

20.8

I respectfully request that you reject Massport's Draft Environmental Impact Report and solicit a more complete study of the proposed plan. This matter needs to be studied from all angles using up-to-date data in order to project what future situations might hold. Your consideration of this matter is greatly appreciated. If you have any questions or need additional information, please do not hesitate to contact me at my office.

Very truly yours,



Michael W. Morrissey
Senator Norfolk and Plymouth District

Letter 20

MA State Senator Michael W. Morrissey

Code	Topic 1	Topic 2	Comment	Response
20.1	Analysis Assumptions/ Methodologies	Base Year	The data and studies used to project the necessity of the new runway were out-of-date, using 1993 as a base year and therefore unreflective of the current situation. For instance, the Airside delay model (DELAISIM) used hourly weather observations from 1981-1990. Due to the effects of El Nino and La Nina the weather patterns have changed significantly within the last five years and this information is no longer relevant. The study should construct and use a new 10-year average.	<p>The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historic perspective to the delay problem at Logan Airport and for use in model calibration. Section 4.6 of the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. It should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project is a comparison of the Preferred Alternative to the No Action Alternative.</p> <p>Comparative analysis of 1981 to 1990 weather with 1989 to 1998 weather identifies no significant differences in statistical properties.</p>
20.2	Delay	Model	There are contradictions in the calculations of delays as well. Massport developed their own model for estimating delay, rather than using the Federal Aviation Administration (FAA)-approved SIMMOD model.	Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports.
20.3	Ground Transportation	Access to Logan Airport	The DEIR does not include studies of other sources of delay that plague Logan Airport. The problems of parking and ground access are critical issues to getting people in and out of Logan quickly and efficiently... with the projected increase in passengers there will be a need for more improvements down the road. When addressing the problem of delays, the whole operation of Logan needs to be taken into consideration, not just the weather.	<p>The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.</p> <p>Massport has implemented an aggressive airport access program designed to increase the use of public transport modes and decrease the reliance on private automobiles to access Logan Airport. The impact of the passenger activity levels, used in the Airside Project documents, on ground access patterns was studied and reported in previous GEIRs. The GEIR analysis indicates that the projected growth can be accommodated by Logan Airport.</p> <p>In addition, Section 2.7 of the Supplemental DEIS/FEIR discusses the proposed MBTA improvements in transit access to Logan Airport. Ground access and mass transit access to Logan Airport was also discussed in the <i>Logan Airport 1999 ESPR</i>. The 1999 ESPR was filed on December 15, 2000.</p>

Code	Topic 1	Topic 2	Comment	Response
20.4	Regional Transportation	Regional Airports	The DEIR also failed to include studies of alternative plans in addition to the proposed runway 14/32. There is no mention of the impact of using several regional airports to relieve some of the traffic flowing into Logan Airport from across the state.	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p> <p>As the analysis in Chapter 2 of the Supplemental DEIS/FEIR indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because a third operating runway is not available during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.</p>
20.5	Purpose and Need	Delays	There have been improvements in regard to delay at Logan Airport. As mentioned earlier there has been a 36% decrease in delays from 1993 to 1997. The FAA has further reported that 1998 delays were 18% lower than 1993 levels, this information was not included in the DEIR.	<p>The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's threshold of 20,000 hours for a severely delayed airport. Refer also to response to Comment 85.4.</p> <p>FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994. In fact, Logan Airport is the second most delayed airport in the nation for arrivals</p>
20.6	Analysis Assumptions/ Methodologies	Planning Period	The DEIR makes no long-term analysis of growth and delay problems at Logan, ending its analysis at the year 2010. By that date, with the new runway, and use of its proposed regional alternatives, Massport still projects delays to have increased by 39,000 hours annually. The Commonwealth needs a long-term solution we can not go through this same situation ten years down the road.	<p>Delay and environmental impacts of the Airside Project were evaluated under a broad range of current and future activity levels at Logan Airport. Current air traffic trends at Logan Airport, as described in the Supplemental DEIS/FEIR, indicate that the 37.5 M level may not be reached until 2015, and the 45 M level may not occur until 2020 or beyond. The planning horizon considered in the airside analysis therefore extends well beyond ten years. Refer also to response to Comment 20.4.</p>

Code	Topic 1	Topic 2	Comment	Response
20.7	Noise	Sound Insulation	Massport has talked about soundproofing the areas that receive the most noise pollution. Did they think about how many homes that will include? This does not seem feasible and even if it is, this does not resolve the problem when people want to use their backyards or when the windows are open.	<p>Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country attempting to receive FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999–2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.</p> <p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <p>Noise abatement and runway use restrictions;</p> <p>Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation;</p> <p>Encouraging growth at Worcester Regional Airport and other alternative airports; and</p> <p>Monitoring and improving achievement of PRAS goals. The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.</p>
20.8	Regional Transportation	Regional Airports	There was not enough exploration into supporting the regional airports and making them alternate locations for air service. We should spread the access and the noise that goes with it, around the region, not just around Boston. This will solve several problems at once. The delay and congestion issues will be improved by diverting travelers to other airports. The residents surrounding the airport will get a slight break with a reduction in noise from aircraft flying over their homes. In addition, travelers that live far from Boston will have closer alternatives with possible cheaper prices.	Refer to response to Comment 20.4.



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 21

SENATOR THERESE MURRAY

PLYMOUTH AND BARNSTABLE
DISTRICT

ROOM 511-C

TEL. (617) 722-1330

FAX (617) 722-1072

COMMITTEES:

HUMAN SERVICES AND ELDERLY
AFFAIRS (CHAIR)

TRANSPORTATION (VICE CHAIR)
WAYS AND MEANS

STEERING AND POLICY
HEALTH CARE

FEDERAL FINANCIAL ASSISTANCE

May 24, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary Durand,

I write to you today to express my opposition to peak period pricing at Boston/Logan International Airport.

21.1

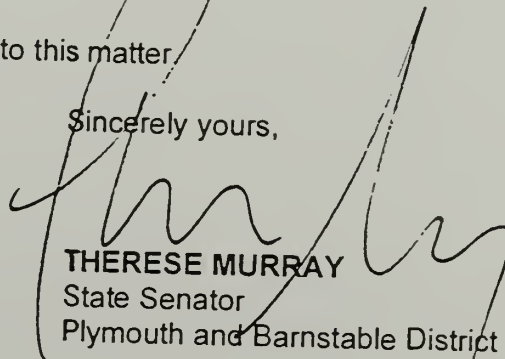
The Cape, as you know, faces many complex transportation issues. Air travel has increased over the years and provides a vital alternative to automobile travel. The demand for these types of alternatives is rising annually. There is no reason we should be contemplating increasing fees on these methods of travel.

Additionally, small rural airports are usually served by smaller airlines. This type of financial hardship will only serve to force these airlines to increase their fares, and eventually put them out of business.

I have spent a tremendous amount of my time on transportation projects throughout the state. I am wholeheartedly committed to promoting alternative modes of transportation in areas, such as the Cape Cod and the South Shore, where roads and bridges are at peak level capacity. I am hopeful you will safeguard what little transportation alternatives exist in the areas and oppose peak period pricing.

Thank you for your attention to this matter.

Sincerely yours,


THERESE MURRAY
State Senator
Plymouth and Barnstable District

TM/ramj

Letter 21

MA State Senator Therese Murray

Code	Topic 1	Topic 2	Comment	Response
21.1	Alternatives	Peak Period Pricing	<p>...express my opposition to peak period pricing at Boston/Logan International Airport.</p> <p>The Cape, as you know, faces many complex transportation issues. Air travel has increased over the years and provides a vital alternative to automobile travel. The demand for these types of alternatives is rising annually. There is no reason we should be contemplating increasing fees on these methods of travel.</p> <p>Small rural airports are usually served by smaller airlines. This type of financial hardship will only serve to force these airlines to increase their fares, and eventually put them out of business.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an updated discussion of PPP at Logan Airport and an analysis of the implications of an illustrative conceptual small community exemption program.</p> <p>Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the <i>1993 Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This Exemption Program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

EUGENE L. O'FLAHERTY
REPRESENTATIVE
2ND SUFFOLK DISTRICT

LISA A. SMITH
LEGISLATIVE AIDE
TEL (617) 722-2370 EXT. 8635

LETTER 22

Committees:
Banks and Banking
Education, Arts and Humanities

ROOM 42, STATE HOUSE
TEL. (617) 722-2370 EXT. 8634

E-Mail:
Rep.GeneOflaherty@house.state.ma.us

April 23, 1999

Mr. Arthur Pugsley
Associate Environmentalist, MEPA
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 2000
Boston, MA 02202

RE: Draft Environmental Impact Statement/Report, Logan Airside Improvements Planning
Project, February, 1999 (EPA Number D-FAA-B51017-MA)

Dear Mr. Pugsley:

I would like to express my concerns with the Draft Environmental Impact Statement/Report (DEIS/R) prepared by the Massachusetts Port Authority regarding the Authority's plans to construct what is commonly called Runway 14/32.

The DEIS/R has failed to address adequately the concerns of Chelsea and Charlestown residents under Logan International Airport's flight paths. Massport projects at least a threefold increase of flights over my district under the air traffic management plans based on construction of Runway 14/32. This is a heavy burden for communities already suffering a disproportionate level of industrial burdens, communities long excluded from many federal and state soundproofing and other mitigation efforts.

22.1

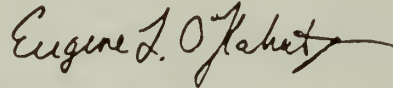
Significant questions remain about the methodology Massport used in preparing the DEIS/R, including how they calculated the flight delay rate, the heart of their argument for Runway 14/32, and how Massport came to the curious conclusion that communities such as Chelsea and Charlestown do not suffer disproportionately from their operations. I respectfully request that you reject the Massachusetts Port Authority and Federal Aviation Administration's DEIS/R for the proposed airside improvements at Logan International Runway. I further request that you do whatever is in your capacity to require the Commonwealth of Massachusetts to create an

22.2

independent commission to conduct a fair and comprehensive assessment of our regional air transportation needs.

Thank you very much for your attention to this important matter. Please do not hesitate to contact me if you have any question about my comments or concerns.

Very truly yours,

A handwritten signature in dark ink, reading "Eugene L. O'Flaherty". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

EUGENE L. O'FLAHERTY
State Representative, 2nd Suffolk District

/las

Letter 22

MA State Representative Eugene L. O'Flaherty

Code	Topic 1	Topic 2	Comment	Response
22.1	Alternatives	Runway 14/32	The DEIS/R has failed to address adequately the concerns of Chelsea and Charlestown residents under Logan International Airport's flight paths. Massport projects at least a threefold increase of flights over my district under the air traffic management plans based on construction of Runway 14/32.	PRAS noise goals are based on the fact that DNL levels above 75 dB are considered unacceptable for residential land use and that DNL levels above 70 dB are also excessively high and should be reduced if feasible. PRAS recommendations are thus designed to shift operations off of runways where these high levels still exist – primarily in Winthrop and to the north of Logan Airport in East Boston and Revere. No one in Chelsea or Charlestown currently experiences noise that is this high.
22.2	Delay	Model	Significant questions remain about the methodology Massport used in preparing the DEIS/R, including how they calculated the flight delay rate.	<p>Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports.</p> <p>The methodology used for the Airside Project provides a consistent and systematic estimate of flight delays caused by constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The analysis based on this methodology indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels. The FAA, who co-authored the Supplemental DEIS/FEIR, approved all the models, which have been validated in previously published studies of Logan Airport.</p>

ANTHONY
PETRUCCELLI

STATE REPRESENTATIVE

57 COTTAGE STREET, EAST BOSTON, MA 02128

617.568.9158

WWW.PETRUCCELLI99.COM

April 22, 1999

LETTER 23

Arthur Pugsley
Associate Environmentalist
MEPA Unit-Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Subject: Comments Regarding EOEA #10458, Logan Airside Planning Project

Dear Mr. Pugsley:

The following comments regarding EOEA #10458, Logan Airside Planning Project are respectfully submitted.

To begin, I have eliminated the word "Improvements" from the official title of this project as an intrinsic distortion of the report's contents. I recommend "Expansion" as an appropriate substitute, in the spirit of accuracy.

- I am unalterably opposed to the proposed unidirectional Runway 14/32. This new runway would more than triple jet flights over some of the most densely populated communities in the region, including the Eagle Hill neighborhood in East Boston. Because these areas already suffer from some of the highest levels of Logan airport jet noise it is simply unacceptable to increase their noise exposure by tripling the number of jet flights on Runway 15R/33L which would result directly from the planned Runway 14/32.

23.1

The tripling of jet flights over these communities is documented in Massport's own draft environmental impact statement/report that is the subject of this review. For example, in Volume III, Technical Appendix H, pages 2 through 4 the data clearly demonstrate that *total jet operations, arrivals and departures, on existing Runway 15R/33L would more than triple in Alternative 1A compared to Alternative 4.* Alternative 1A is Massport's preferred alternative that is based on the unidirectional Runway 14/32 while Alternative 4 is current airport configuration. Jet operations from Runway 15R/33L are the main source of aircraft noise exposure for these residential communities.

I am opposed to Runway 14/32 for other reasons:

Runway 14/32 points directly at East Boston's most densely populated neighborhood, Jeffries Point, which currently is not subjected to direct overflights although the area suffers heavily from aircraft ground noise. Massport claims in the DEIS/R that Jeffries Point will not experience Runway 14/32 overflights because it will be designated as a unidirectional runway with overwater operations only.

However nowhere in the DEIS/R does Massport describe the irreversible legal instruments that would be necessary to guarantee against any future reversal of a temporary unidirectional runway operation. In fact statements on pages P-4 and P-5 in the section entitled Massport - FAA Roles make it clear that any runway operational restrictions put in place today would be subject to future modification pending application from Massport to the FAA when both agencies will be administered by different policy makers.

23.2

Runway 14/32 would jeopardize Jeffries Point even in a unidirectional configuration due to the inevitable overflights resulting from missed approaches to Runway 32 which would pass directly over the neighborhood.

23.3

• I am opposed to the proposals to reduce the bad weather instrument landing system (ILS) minimums on Runways 15R, 27 and 22L. The effect of these actions would be to expose residential communities to increased jet flight noise from the additional jet overflights attendant on the increased availability of these runways to operational usage compared to existing conditions. This negative environmental effect is described in the DEIS/R, Volume III, Technical Appendix D, page 2: *"The proposal to reduce the ILS minimums to the lowest allowable for these three runways would increase their annual availability, and allow operations to continue during periods of low visibility..."*

23.4

However I do support the proposal to reduce the Runway 33L ILS minimums because this might shift some bad weather landings from overland to overwater approaches.

23.5

ANTHONY
PETRUCCELLI

★ ★ ★
★ ★ STATE REPRESENTATIVE

57 COTTAGE STREET, EAST BOSTON, MA 02128

617.568.9158

WWW.PETRUCCELLI99.COM

• I am opposed to the centerfield taxiway proposal because of it's potential negative noise impacts on the Orient Heights area of East Boston, particularly the Bayswater Street neighborhood. 23.6

The DEIS/R is deficient in that it does not adequately address alternatives to the alleged Logan Airport delay problem which is the basis of the proposed expansion plan. A regional airport system plan is called for which would fully utilize the potential of other regional airports such as Providence, RI and Manchester, NH. 23.7

I am also opposed to the DEIS/R because it completely fails to address the larger problem of airport related activities on the quality of life of East Boston. The existing growth rate of Logan Airport threatens to suffocate our community with air freight warehouses, heavy truck traffic, rental vehicles and other similar activities. I again call on the Massachusetts Office of Environmental Affairs to immediately institute a complete freeze on all Logan airport related activities in East Boston to protect our community from being totally overwhelmed by the airport. 23.8

Sincerely,

Anthony Petruccelli

Anthony Petruccelli

Letter 23

MA State Representative Anthony Petruccelli

Code	Topic 1	Topic 2	Comment	Response
23.1	Alternatives	Runway 14/32	Runway 14/32 would more than triple jet flights over some of the most densely populated communities in the region, including the Eagle Hill neighborhood in East Boston. Because these areas already suffer from some of the highest levels of Logan Airport jet noise it is simply unacceptable to increase their noise exposure by tripling the number of jet flights on Runway 15R/33L which would result directly from the planned Runway 14/32.	While Eagle Hill is expected to experience significant noise exposure above 65 DNL for various future scenarios, it is <i>not</i> among the most highly exposed areas around Logan Airport. The most highly exposed areas are primarily in Winthrop and to the north of Logan Airport in East Boston and Revere (see Tables 6.2-5 and 6.2-24). As a consequence, with the increased flexibility in use of runways afforded by Runway 14/32, PRAS tends to recommend additional overflights of Eagle Hill so as to benefit more highly exposed areas experiencing levels of 70 or 75 DNL and above.
23.2	Alternatives	Runway 14/32	Nowhere in the DEIS/R does Massport describe the irreversible legal instruments that would be necessary to guarantee against any future reversal of a temporary unidirectional runway operation.	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i> , all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
23.3	Alternatives	Runway 14/32	Runway 14/32 would jeopardize Jeffries Point even in a unidirectional configuration due to the inevitable overflights resulting from missed approaches to Runway 32 which would pass directly over the neighborhood.	Runway 14/32 will be used primarily in VFR weather conditions. A missed approach, which is an exceedingly rare occurrence in VFR conditions, would not affect Jeffries Point because it would turn to the left.
23.4	Alternatives	Reduced Approach Minimums	I am opposed to the proposals to reduce the bad weather instrument landing system (ILS) minimums on Runways 15R, 27 and 22L. The effect of these actions would be to expose residential communities to increased jet flight noise from the additional jet overflights attendant on the increased availability of these runways to operational usage compared to existing conditions.	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise. For example, reducing the Runway 22L decision height to 200 feet moves the maximum noise point to approximately 3,000 feet from touchdown which is further from populated areas in East Boston than the current maximum noise point. Although categorically excluded from NEPA review, modeling of the changes in runway availability from reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result were included in the Airside Project in compliance with an earlier agreement among Massport, the FAA and the City of Boston.

Code	Topic 1	Topic 2	Comment	Response
23.5	Alternatives	Reduced Approach Minimums	I do support the proposal to reduce the Runway 33L ILS minimums because this might shift some bad weather landings from overland to overwater approaches.	The implementation of the Category III ILS for Runway 33L will be evaluated at a later date in a separate EIS upon completion of the Runway Safety Ends Improvement Project.
23.6	Alternatives	Taxiway Improvements	I am opposed to the centerfield taxiway proposal because of potential negative noise impacts on the Orient Heights area of East Boston, particularly the Bayswater Street neighborhood.	<p>The ground taxi noise calculated for the northeast end of Runway 4/22, at locations in Winthrop and East Boston, show small to moderate <i>reductions</i> in ground noise of 2 to 3 dB for the Preferred Alternative when compared to the No Build Alternative (refer to Tables 6.2-15, 6.2-16, and 6.2-17 in the Supplemental DEIS/FEIR). This is true for average and for maximum propagation conditions and for all operational scenarios examined. The main reason for these noise decreases is the reduction of the number of taxiing aircraft waiting to takeoff on Runways 22L&R.</p> <p>The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waiting on the taxiways reducing ground noise and emissions for close in residents of East Boston and Winthrop.</p>
23.7	Regional Transportation	Regional Airports	The DEIS/R is deficient in that it does not adequately address alternatives to the alleged Logan Airport delay problem which is the basis of the proposed expansion plan. A regional airport system plan is called for which would fully utilize the potential of other regional airports such as Providence, RI and Manchester, NH.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
23.8	Alternatives	Impacts	I am also opposed to the DEIS/R because it completely fails to address the larger problem of airport related activities on the quality of life of East Boston. The existing growth rate of Logan Airport threatens to suffocate our community with air freight warehouses, heavy truck traffic, rental vehicles and other similar activities.	<p>The purpose of the Airside Improvements Planning Project is to reduce current and projected levels of airfield congestion and delay and to enhance the safety of aircraft operations at Logan Massport's proposed landside improvements are planned to enhance the efficiency of passenger processing, and include terminal modernization, as well as roadway, parking and service area improvements. The landside projects will not affect the design or implementation of the Airside Project, which has independent utility, nor will the Airside Project improvements affect the design or implementation of any of the landside projects. All airside and landside projects, where required, will continue to be the subject of separate comprehensive environmental analysis by project proponents in accordance with federal and state regulations.</p> <p>As expressed in the May 7, 1999 EOECA Certificate, Massport's ESRP (formerly GEIR) process "is expected provide a big picture cumulative impact analysis of Logan operations, impacts and mitigation. It complements the project-specific EIRs," such as this one for the Airside Improvements, "helps to focus the review process of individual EIRs, and ensures that segmented project review does not occur in the context of MEPA review at Logan Airport."</p>



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 24

April 7, 1999

COMMITTEES:
SENATE WAYS AND MEANS
HEALTH CARE
ENERGY

NATOR HENRI S. RAUSCHENBACH
CAPE & ISLANDS DISTRICT
ROOM 421
TEL (617) 722-1570
DISTRICT OFFICE
TEL (508) 362-4556
E-Mail: HRausche@senate.state.ma.us
Web Page: www.capecod.net/senrauschenb

Massachusetts Environmental Protection Agency
1 Winter Street
Boston MA, 02108

Dear Secretary Durand:

I write to you in determined support of proposed runway 14/32 at Logan International Airport. The transportation needs of my district are inexorably linked to Logan airport in much the same way as every other region in eastern Massachusetts. Efficient operation of the Boston airport has immediate and measurable impact on economics and quality of life for Cape and Islands residents. For instance, Cape Air/Nantucket Airlines, the largest independent regional server in the country, flies 150,000 passengers to and from Boston each year. Passengers include Cape and Island residents traveling on business as well as those seeking medical procedures or other services unavailable locally. Moreover, air transport is central to the success of our tourism industry, one of the main sources of my constituent's livelihoods. In all, the unique geographic realities of the Cape and Islands wed our interests to events at Logan. Too often, delays in Boston become fully manifest in local consequences.

I thank you for your consideration and do urge your favorable view of this initiative.

Respectfully Submitted,

Henri S. Rauschenbach
State Senator
Cape & Islands district

24.1

Letter 24

MA State Senator Henri S. Rauschenbach

Code	Topic 1	Topic 2	Comment	Response
24.1	Alternatives	Runway 14/32	I write to you in determined support of proposed runway 14/32 at Logan International Airport. Efficient operation of the Boston airport has immediate and measurable impact on economics and quality of life for Cape and Islands residents. Cape and Island residents travel on business as well as seek medical procedures or other services unavailable locally. Moreover, air transport is central to the success of our tourism industry. Too often, delays in Boston become fully manifest in local consequences.	Comment noted.

House of Representatives

BYRON RUSHING

State House - Room 542B
Boston, MA 02133-1054
(617) 722-2637
Rep.ByronRushing@house.state.ma.us

LETTER 25

April 22, 1999

Ninth Suffolk District
Audubon Circle
Copley Place
Fenway
Lower Roxbury
Orchard Park
Prudential
St. Botolph
South End

Arthur Pugsley
Executive Office of
Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attn: MEPA Office

Re: Logan Airside Improvements Planning Project, Boston, MA. EOE
#10458.

Dear Mr. Pugsley:

I am writing to comment on the Draft Environmental Impact
Statement/Report (EIS/R) for the above project.

I have represented the South End and Lower Roxbury neighborhoods of
Boston in the Massachusetts House of Representatives since 1983. I
serve on the Joint Committee on Transportation in the Legislature. In
1995 and 1996 I attended the final meetings of the Runway 27 EIS
Advisory Committee (That EIS was completed in 1996 and the FAA
Record of Decision was signed in 1977. As of April of this year, the
approved flight track for departures off Runway 27 is still not being flown
accurately within the accepted flight corridor by the majority of planes).

I request the Secretary of Environmental Affairs find the Draft EIS/R
inadequate and incomplete and order that the Draft EIS/R be withdrawn
from further public consideration or processing pending the development
of a meaningful participatory process for evaluation of alternatives to the
Runway 14/32 proposal. I request the Secretary to ask also that for an
equitable, comprehensive, long-term, air and ground and water
transportation program for the region be adopted before any further
consideration of this proposal or any other proposed expansion of or at
Logan Airport.

I have come to these conclusions in regard to the Draft EIS/R and to
Massport's handling of this process for the following reasons:

1. The Airside Improvements Project will impose an unacceptable noise burden upon my constituents and other communities without any commensurate benefit either to Logan Airport or to the citizens of the Commonwealth. The EIS/R argues a narrow case for construction of a new runway and taxiway without examining in appropriate detail how these construction projects will adversely affect the surrounding impacted communities. The EIS similarly fails to evaluate the effect of the increased demand which will be generated by the proposed construction project on its terminal facilities, baggage handling parking capacity, public transportation and road access at the airport.

25.1

2. Massport's assertions about delay are questionable at best. The Citizens Advisory Committee to Massport (CAC) has determined the Massport failed to use readily available data on delay from the FAA to support its representations about the severity of the problem at Logan. My community's representative on that body has convinced me that there is no basis for Massport's assertions about the new runway as a tool for delay reduction at the airport. To the contrary, it appears that the delay situation will worsen within 5 years or less while Logan will have subjected its neighbors to an environmental nightmare of noise and pollution.

25.2

25.3

I do not believe that delays at Logan airport justify this \$20 million proposed short-term solution. I know that Logan has problems and that delays are one of them. But Massport has not explained to my satisfaction what causes whatever number of delays there are. Are they delays which are unavoidable due to storms and dangerous weather conditions? Are they caused by the airlines? By delays at other airports? By cargo and baggage handling and ground transportation problems? It is counterintuitive to say delays are the problem and then advocate increasing capacity at the airport. No one has demonstrated that delays at Logan have slowed down growth in Boston for the past ten years.

25.4

The burden of proof is on Massport. It has failed to articulate any standard for acceptable delay or growth at Logan. It has also failed to provide a long-term or comprehensive analysis of the general congestion at the airport. Almost all of the airfield delay data is simulated. Actual delay has decreased since 1993 according to the CAC consultants and they question the discrepancy between FAA and Massport methodology. In any event, actual data on delay over the years is not presented.

25.5

3. The EIS/R gives short shrift to fundamental environmental justice implications of the proposal. It contains no detailed evaluation of the impacts of this project on minority and low-income populations living adjacent to the project. The document shows that Massport did not actively obtain the population and impact information required by the executive Order 12898 and the DOT Order regarding environmental

25.6

justice. The only specific data presented is noise data, which compares the projected noise impacts (which are significantly understated) in particular communities to the study area as a whole, rather than showing the discrepancies among and between various communities which are impacted by the project; and other impacts, such as the impacts from air pollutants and odor, are not addressed at all. The environmental justice information is presented in a way which suggests Massport simply "checking off" its requirement rather than attempting, in good faith, to provide a meaningful evaluation of the project on minority and low-income communities.

Furthermore, Massport has failed to perform any outreach to impacted non-English-speaking Latino residents in my Districts. There is a large community here, several thousand residents in Villa Victoria and in Lower Roxbury who will be severely and adversely impacted by this proposed runway construction project. Massport's failure to attempt any opportunity for comment by Spanish and Portuguese speakers is a direct violation of the Executive Order.

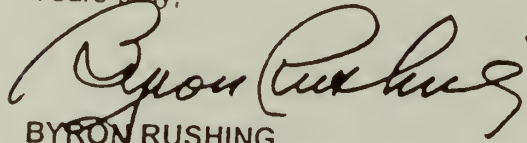
25.7

4. The project, by Massport's own account in the DEIS, will generate, at best, limited, dubious and short term benefits for the traveling public while imposing onerous and permanent noise and pollution burdens on Massport's neighbors. The Runway construction proposal is an ill-conceived stop-gap measure which would fundamentally alter the configuration and capacity of the airport and cause increased environmental injury to Logan's neighbors.

I cannot end these comments without mentioning the outrage expressed by many of my constituents regarding Massport's attempts to skew the process. Massport's paid advertising campaign, during the public comment period, is an outrageous violation of the spirit of the environmental laws with which Massport has to comply in order to receive approval for this project. That it would engage in such a blatant attempt to influence the environmental process by purveying false and misleading information about the purposes and results of this complex project should, in itself, be viewed as grounds to reject the EIS/R. If left to stand, it will make a mockery of the environmental process itself. Many more people will have heard the false claims in the TV and radio advertising than will have had access to the Environmental Impact Statement. That Massport refused to hold educational meetings in many communities and failed to provide any information in the Spanish language while engaging in deceptive advertising should be severely sanctioned. In no event should Massport, or a group calling itself Citizens for Efficient Regional Transportation, be allowed to submit to MEPA any results from an alleged "survey" being conducted in conjunction with this

campaign. The "survey" is completely biased and uses invalid polling methods to come up with a result predestined to favor the project.

Yours truly,

A handwritten signature in dark ink, appearing to read "Byron Rushing". The signature is fluid and cursive, with the first name "Byron" being more prominent than the last name "Rushing".

BYRON RUSHING
State Representative

Letter 25

MA State Representative Byron Rushing

Code	Topic 1	Topic 2	Comment	Response
25.1	Noise	Impacts	The Airside Improvements Project will impose an unacceptable noise burden upon my constituents and other communities without any commensurate benefit either to Logan Airport or to the citizens of the Commonwealth. The EIS/R argues a narrow case for construction of a new runway and taxiway without examining in appropriate detail how these construction projects will adversely affect the surrounding impacted communities.	<p>Section 4.3 of the Supplemental DEIS/FEIR contains a history of PRAS development and performance at Logan Airport.</p> <p>In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overfly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels. With the Preferred Alternative, when Logan Airport reaches 29 million passengers, overflights from Runway 4 arrivals and Runway 22 departures, which affect South Boston, Quincy, Milton, and Braintree, will decrease from 107,861 in 1998 to 58,305 operations.</p> <p>Noise was identified as the only off-airport impact from the Preferred Alternative with the potential for environmental justice impacts. The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. However, because the area added to the 65 dB DNL contour is primarily within the City of Chelsea, other environmental and health issues were also considered in an effort to assess other cumulative or multiple adverse exposures.</p> <p>Section 4.3 of the Supplemental DEIS/FEIR provides an evaluation of existing measures for monitoring PRAS performance and demonstrates that the FAA has improved its performance relative to the PRAS goals. The Preferred Alternative mitigation program includes additional reporting requirements recommended to enhance the monitoring effort.</p>
25.2	Ground Transportation	Access to Logan Airport	The EIS fails to evaluate the effect of the increased demand which will be generated by the proposed construction project on its terminal facilities, baggage handling parking capacity, public transportation and road access at the airport.	<p>Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport.</p> <p>The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.</p>

Code	Topic 1	Topic 2	Comment	Response
25.3	Delay	Model	<p>Massport failed to use readily available data on delay from the FAA to support its representations about the severity of the problem at Logan. My community's representative on that body has convinced me that there is no basis for Massport's assertions about the new runway as a tool for delay reduction at the airport. To the contrary, it appears that the delay situation will worsen within 5 years or less while Logan will have subjected its neighbors to an environmental nightmare of noise and pollution.</p>	<p>Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports.</p> <p>Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.</p> <p>The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...."</p> <p>The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.</p>
25.4	Purpose and Need	Delay	<p>Massport has not explained to my satisfaction what causes whatever number of delays there are. Are they delays which are unavoidable due to storms and dangerous weather conditions? Are they caused by the airlines? By delays at other airports? By cargo and baggage handling and ground transportation problems? No one has demonstrated that delays at Logan have slowed down growth in Boston for the past ten years.</p>	<p>Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion by addressing constraints at Logan Airport. Delays caused by conditions at other airports or other factors, such as mechanical failure, are not addressed since Massport cannot influence these delays. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.</p>

Code	Topic 1	Topic 2	Comment	Response
25.5	Delay	Model	Massport has also failed to provide a long-term or comprehensive analysis of the general congestion at the airport. Actual delay has decreased since 1993 according to the CAC consultants and they question the discrepancy between FAA and Massport methodology. Actual data on delay over the years is not presented.	The Draft EIS and Supplemental DEIS/FEIR contain detailed analyses of congestion at Logan Airport for six future operating scenarios, which at current growth rates are expected to extend to the year 2024. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays which would be directly affected by Runway 14/32 have risen steadily since 1994. The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States. Logan Airport's estimated annual delay hours in 1998 were over six times the FAA's threshold of 20,000 hours for a severely delayed airport. Refer to Section 1.4 and Appendix C of the Supplemental DEIS/FEIR for a discussion of the FAA and DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.
25.6	Environmental Justice	Demographic Data	The EIS/R contains no detailed evaluation of the impacts of this project on minority and low-income populations living adjacent to the project. The document shows that Massport did not actively obtain the population and impact information required by the executive Order 12898 and the DOT Order regarding environmental justice. The only specific data presented is noise data, which compares the projected noise impacts (which are significantly understated) in particular communities to the study area as a whole, rather than showing the discrepancies among and between various communities which are impacted by the project; and other impacts, such as the impacts from air pollutants and odor, are not addressed at all.	<p>Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation.</p> <p>A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.</p> <p>Noise was identified as the only off-airport impact from the Preferred Alternative with the potential for environmental justice impacts. The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. However, because the area added to the 65 dB DNL contour is primarily within the City of Chelsea, other environmental and health issues were also considered in an effort to assess other cumulative or multiple adverse exposures. Refer to Section 6.8.6 of the Supplemental DEIS/FEIR for additional information.</p>

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The Commonwealth of Massachusetts

House of Representatives

State House, Boston 02133-1051

LETTER 26

April 23, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Mr. John C. Silva
Manager, Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Mr. Pugsley and Mr. Silva:

Recognizing that the public comment period for the Draft Environmental Impact Statement/Report on the Logan Airside Improvements Planning Project is drawing to a close, and that Massport is preparing to move ahead with the next stage of the MEPA/NEPA process, I thought this an appropriate time to express my ideas and concerns about the Airside Improvements Planning Project as it is currently structured. I am writing to you as a member of the Joint Committee on Transportation and as an elected representative from the town of Braintree who has had an opportunity to fully review the plans for the Airside Improvements Planning Project.

It is evident that, due to the unique weather and wind patterns around Logan Airport, the airport is subject to delays, even on perfectly clear days. The current runway lay-out makes the airport especially vulnerable to delays, a problem that the proposed Runway 14/32 is designed to alleviate. Delays are understandably unpopular with travelers, especially with business travelers, and none of us want to see Logan so hobbled by schedule problems that Boston becomes known as a notoriously difficult destination. That would be harmful both to our economy and to our civic pride. Moreover, delays are also damaging to our environment, as planes idle on the tarmac and circle in the sky, all the while releasing foul fumes into the air.

Recognizing that delays are a serious impediment to the smooth and efficient management of operations at Logan Airport, we still need to ask some important questions about the Airside Improvements Planning Project, and especially about the long-term efficacy of any proposal that includes runway construction. The first and most obvious question is based on the assumption

that Runway 14/32 will be built: for how long will it be able to alleviate current and projected delays? Although Massport has attempted to answer this question, the Citizen's Advisory Committee has supplied me with alternative data, and I would like some clarification on this point.

26.1

Conversely, if we choose not to act on the Airside Improvements Planning Project at this juncture, where will Massport find itself in ten years or twenty years? If we do move ahead with the proposed plan, will this be the final piece in the overall puzzle of modernizing Logan?

26.2

The Draft EIS/EIR further claims that Runway 14/32, combined with the other improvements included in the Airside Improvements Planning Project, will "...allow noise impacts to be spread more equitably across communities and over water..."¹ This should offer much-needed relief for certain neighboring communities currently receiving the major share of noise and other impacts from Logan Airport, an effort I applaud.

In order to manage the current weather-related delays, it is clear Massport needs to make modifications to its existing operations. A reduction in the number of delays, coupled with a more equitable distribution of the impact of airport activities, is obviously a worthy goal. But it is important not to be short-sighted in our approach to improving Massport's current infrastructure. Massport needs to recognize the importance of taking a long-term, regional approach to air and ground transportation in the Commonwealth, including expanding the use of the airports in Worcester and New Bedford. These airports will never function on the same scale as Logan, but they can provide valuable service for their immediate communities.

26.3

The following is a list of points which should be addressed as Massport prepares to move forward with the Airside Improvements Planning Project:

- Any discussion of proposed Runway 14/32 must include conditions for it to be used only as a unidirectional runway. Massport has made this a part of the Draft EIS/EIR, but it must now demonstrate to the communities of the Citizens Advisory Committee that it is capable of making and keeping that commitment. Logan's neighbors will count on that promise to be maintained even as traffic grows at Logan. A firm commitment to the unidirectional runway will not only help to limit the impact of airplane noise on the surrounding communities but will also add an important level of credibility to the proposal.
- Massport and the Federal Aviation Administration must seriously consider a long-term plan to expand the capacity of the Commonwealth's other airports, including Worcester Regional Airport. An increase in the use of our other airports would help to relieve some of the pressure on Logan. A number of options should be weighed, including relocating to one of the state's smaller airports a portion of the freight traffic and/or the private/corporate jet traffic that currently flows through Logan.

26.4

26.5

- The Commonwealth should work with the states of New Hampshire and Rhode Island, home respectively to Manchester Airport and T.F. Greene Airport, to develop a comprehensive tri-state plan for managing ground and air traffic in and out of New England. As both passenger and freight traffic in the region increase in the future, Logan will not be able to efficiently handle all of the air-traffic demand without assistance from airports in our neighboring states. 26.6
- To further assist those communities that may experience an increase in airplane noise from an increase in activity at Logan, Massport and the Federal Aviation Administration must establish an expanded noise abatement program, including increased funding for residential sound-proofing efforts. Massport and the Federal Aviation Administration should also explore the possibility of requiring planes using Logan's facilities to either be new and therefore less noisy or else to have been retrofitted for noise reduction. I understand that there are other urban airports in the country that have restrictions on the types of aircraft that can use their runways, a mechanism that Massport should consider. 26.7
- Massport should also work with the impacted communities to consider the possibility of establishing rules about hours of operation for Runway 14/32 that are acceptable to the residents of those communities as well as to the airport. Massport currently has certain rules about how late planes can fly in and out of Logan; those rules should be strengthened in response to community concerns about noise. 26.8
- As mentioned in Section 2.4.2.5. of the Draft EIS/EIR, Massport has worked to calculate the impact of Amtrak's new high-speed rail service on the number of people using Logan. I have seen and read several different figures for this projected impact, and I believe it's important to develop precise data. 26.9
- The issue of peak-hour pricing, which is covered in the Draft EIR/EIS and which has been a part of the public discussion on the Airside Improvements Planning Project, is a mechanism which I believe will not help to alleviate the current problem of delays at Logan Airport. It has been demonstrated to me that peak-hour pricing may do economic harm to some of the smaller airlines serving our region, those same carriers that the proposed Runway 14/32 is specifically designed to serve. For this reason, I believe that peak-hour pricing would not be an appropriate administrative choice for Massport at this point. 26.10
- 26.11

Over the past decade, the Commonwealth has worked aggressively to improve its transportation networks and to upgrade its existing transportation infrastructure. The opening of the Ted Williams Tunnel (T.W.T.), the direct connection between the Massachusetts Turnpike and the Ted Williams Tunnel, the progress of the Central Artery Project, and the modernization of the MBTA's Blue Line are all projects that have and will directly improve access to Logan Airport from downtown Boston and beyond. It is not an accident that these projects have been made a priority by the Commonwealth as they increase intermodal accessibility around the Greater Boston area. In order for these investments to have the maximum possible impact, however, it is vital that Logan be able to function as efficiently and smoothly as possible.

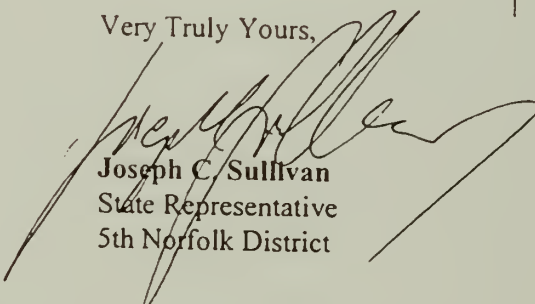
The proposed construction of Runway 14/32 and the Centerfield Taxiway is designed to alleviate current weather-related delays only. But projections show a growth in the number of trips to and from Logan, growth that will occur regardless of whether we move ahead with the Airside Improvements Planning Project. In a way, this is a good problem, because it demonstrates what we already know: that the Boston area is a wonderful place to spend time. Our rich history, thriving financial, educational, and health care sectors, as well as its proximity to the beaches of Cape Cod and the ski slopes of the Berkshires all make Boston a desirable destination. The new Convention Center, when it is completed, will be a further draw. We need to find a way to balance the projected and potential growth at Logan, however, with the quality of life concerns of the cities and towns under the Logan flight paths. This is not a case of 'build it and they will come,' for they are already coming. We need to address that fact in a manageable, efficient, and effective way.

At the same time, however, we must think about the long-term future of air travel in New England, and that requires us to plan more broadly. Therefore, must begin to incorporate the Commonwealth's smaller airports into our aviation network, whether for passengers or for freight, and we must look beyond our borders to airports in our neighboring states.

As one who travels through Logan Airport, and who tries to understand the myriad transportation programs of the Commonwealth, I know that access to safe, convenient, and affordable air travel is in the best interest of Massachusetts and New England as we move into the 21st century.

It is my hope that you will consider my thoughts in the sincere way that they have been offered.

Very Truly Yours,



Joseph C. Sullivan
State Representative
5th Norfolk District

cc: Mr. Peter Blute
Executive Director, Massport

Letter 26

MA State Representative Joseph C. Sullivan

Code	Topic 1	Topic 2	Comment	Response
26.1	Alternatives	Runway 14/32	For how long will Runway 14/32 be able to alleviate current and projected delays?	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented, the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
26.2	Purpose and Need	Delay	If we choose not to act on the Airside Improvements Planning Project at this juncture, where will Massport find itself in ten years or twenty years? If we do move ahead with the proposed plan, will this be the final piece in the overall puzzle of modernizing Logan?	<p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented, the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.</p> <p>Massport has developed a range of potential future traffic levels for planning purposes. For a variety of reasons, Massport believes that the forecasts described as 1999 and 2010 projections in the <i>Logan Airside Improvements Feasibility Study, Phase I Report and the DEIS/EIR</i> will not be achieved until after 1999 and 2010, respectively. The Airport is likely to reach 29 million passengers (formerly the "1999" forecast) in 2003. Developments at the regional airports and Amtrak's high speed Acela Express rail service to New York are expected to further slow Logan Airport's passenger traffic growth. As a result, Logan Airport is now expected to reach 37.5 million passengers in 2015 and 45 million passengers in 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period that extends beyond 2020. Refer to Chapters 1 and 4 of the Supplemental Draft EIS/Final EIR for a complete discussion of the planning forecasts.</p>

Code	Topic 1	Topic 2	Comment	Response
26.3	Regional Transportation	Regional Airports	Massport needs to recognize the importance of taking a long-term, regional approach to air and ground transportation in the Commonwealth, including expanding the use of the airports in Worcester and New Bedford.	<p>Extensive analysis of impacts of the 37.5 million scenario is discussed in detail in Chapters 5 and 6 of the Supplemental DEIS/FEIR.</p> <p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.</p> <p>Massport reports on the status of the New Bedford Airport Project in Section 2.6 of the Supplemental DEIS/FEIR.</p>
26.4	Alternatives	Runway 14/32	Any discussion of proposed Runway 14/32 must include conditions for it to be used only as a unidirectional runway. Massport must now demonstrate to the communities of the Citizens Advisory Committee that it is capable of making and keeping that commitment.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>

Code	Topic 1	Topic 2	Comment	Response
26.5	Regional Transportation	Regional Airports	Massport and the Federal Aviation Administration must seriously consider a long-term plan to expand the capacity of the Commonwealth's other airports, including Worcester Regional Airport. A number of options should be weighed, including relocating to one of the state's smaller airports a portion of the freight traffic and/or the private/corporate jet traffic that currently flows through Logan.	<p>While Massport has no jurisdiction over the development, operation or use of infrastructure at airports other than Logan Airport, Hanscom Field, and Worcester Regional Airport (as of January 2000), Massport is engaged in promoting the use of other alternative regional airports and travel modes to relieve traffic growth pressures at Logan Airport. Refer to response to Comment 26.3.</p> <p>Since cargo operations account for only two percent of aircraft activity at Logan Airport and occur during off-peak hours, cargo operations do not contribute to delays at Logan Airport.</p> <p>General Aviation, including private jets comprise only 5 percent of Logan Airport operations. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users.</p>
26.6	Regional Transportation	Regional Airports	The Commonwealth should work with the states of New Hampshire and Rhode Island, home respectively to Manchester Airport and T.F. Greene Airport, to develop a comprehensive tristate plan for managing ground and air traffic in and out of New England.	Refer to response to Comment 26.3.
26.7	Noise	Sound Insulation	Massport and the Federal Aviation Administration must establish an expanded noise abatement program, including increased funding for residential sound-proofing efforts.	<p>Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country attempting to receive FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999-2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.</p>
26.8	Noise	Hushkitted Aircraft	Massport and the Federal Aviation Administration should also explore the possibility of requiring planes using Logan's facilities to either be new and therefore less noisy or else to have been retrofitted for noise reduction.	<p>For over ten years, Massport has had several noise rules that have increased the proportions of quieter airplanes in the Logan Airport fleet. However, as of 2000, the FAA requires that almost all commercial aircraft comply with the Stage 3 FAR Part 36 noise certification standards which, up to now, have only applied to certain new aircraft types. As a result, almost all aircraft in the Logan Airport fleet in 2000 and subsequent years will be of the new quiet, Stage 3 types or hushkitted Stage 2 aircraft. Section 5.2 of the Supplemental DEIS/FEIR discusses the status of the use of hushkitted Stage 3 aircraft at Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
26.9	Alternatives	Runway 14/32	Massport should also work with the impacted communities to consider the possibility of establishing rules about hours of operation for Runway 14/32 that are acceptable to the residents of those communities as well as to the airport. Massport currently has certain rules about how late planes can fly in and out of Logan; those rules should be strengthened in response to community concerns about noise.	The intent of Massport's Noise Rules, which were first drafted in the 1970s, was to minimize the exposure from Logan Airport's aircraft operations on residential areas. Since the Massport Noise Rules were first enacted, the National Noise Policy Act (the "Noise Act") was enacted as Federal law. Under the Noise Act, future amendments to Massport's Noise Rules or other types of airport access restrictions are subject to FAA review and require completion of a FAR Part 161 Study. Since the Noise Act was enacted, the FAA has not approved any Part 161 access restrictions proposed by airport operators.
26.10	Regional Transportation	Passenger Rail	It's important to develop precise data on the impact of Amtrak's new high-speed rail service on the number of people using Logan.	The analysis of regional alternatives presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR relies on air to high-speed rail diversion estimates published in the Supplemental DEIS/FEIR and Section 4(f) Statement, Northeast Corridor Improvement Project, prepared by the Federal Rail Administration in October 1994. In preparing the Supplemental DEIS/FEIR, Massport contacted Amtrak for more recent estimates, but Amtrak did not have any updated ridership estimates that could be released to Massport. Amtrak's written response to Massport's request for updated ridership numbers is contained in Appendix B of the Supplemental DEIS/FEIR.
26.11	Alternatives	Peak Period Pricing	The issue of peak-hour pricing, which is covered in the Draft EIR/EIS and which has been a part of the public discussion on the Airside Improvements Planning Project, is a mechanism which I believe will not help to alleviate the current problem of delays at Logan Airport. Peak-hour pricing may do economic harm to some of the 10 smaller airlines serving our region, those same carriers that the proposed Runway 14/32 is specifically designed to serve. For this reason, I believe that peak-hour pricing would not be an appropriate administrative choice for Massport at this point.	<p>Refer to Section 4.5 of the Supplemental DEIS/FEIR for an expanded discussion of PPP. An exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5.3 of the Supplemental DEIS/FEIR. The section provides an illustrative exemption program and its impact on the delay reduction potential of PPP.</p> <p>The analysis in the Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR shows that, because PPP eliminates a small number of small aircraft operations, it does not produce any environmental benefits or impacts. The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the 1993 <i>Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>



The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

TIMOTHY J. TOOMEY, JR.
STATE REPRESENTATIVE
29TH MIDDLESEX DISTRICT
SOMERVILLE - CAMBRIDGE
TEL. (617) 722-2230

E-Mail:
Rep.TimothyToomey@house.state.ma.us

LETTER 27

Chairman
Committee on Public Safety
ROOM 39, STATE HOUSE

April 21, 1999

Robert Durand, Secretary
MEPA Unit Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: Draft Environmental Impact Report EOE A #10458
Logan Airport Expansion

Dear Secretary Durand:

I am writing to express my strong opposition to the proposal of the Massachusetts Port Authority (Massport) for the expansion of Logan International Airport (Logan). The proposed expansion of Logan will have a devastating impact on the quality of life in my legislative district, particularly upon those who reside in East Somerville and East Cambridge.

If Massport moves forward on its proposal to expand Logan, the number of flights over East Somerville and East Cambridge will increase three-fold to approximately 20,000 operations each year. The runway at Logan that most directly impacts my legislative district is 33L. Currently, runway 33L generates approximately 6,000 operations annually. However, with the proposed expansion, runway 33L usage -- and the resulting noise and air pollution -- will triple. It is unfair to require the predominantly working class neighborhoods to the West of Logan to shoulder so much of the burden of the proposed expansion.

Another major problem with the proposed expansion of Logan is the fact that at best this is a temporary solution to the delay problems there. By 2005 Logan will experience as many, if not more delays than in 1998 with the proposed expansion, according to Massport's own estimates. The short term relief that Massport's expansion proposal would provide does not warrant the permanent loss of quality of life for the residents of the communities to the West of Logan.

27.1

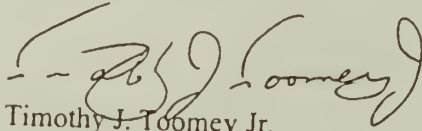
27.2

I agree that the Commonwealth has to take action to address the problem of increased air traffic in eastern Massachusetts. The best way to do this, however, is to follow the lead of our competitors to the South. Both New York City and Washington DC have secondary airports that can handle the increasing demand for air travel. It is time for the Commonwealth to explore the possibility of expanding one of the regional airports already in existence. This will accomplish two major goals: decreasing demand at Logan and more equitably distributing air traffic throughout the Commonwealth. Such a solution would be beneficial to the business interests as well as the human interests currently at stake. I strongly urge the MEPA unit to deny any permits for the expansion of Logan at this time.

27.3

Thank you for your attention to this very important matter.

Sincerely Yours,



Timothy J. Toomey Jr.

Letter 27

MA State Representative Timothy J. Toomey

Code	Topic 1	Topic 2	Comment	Response
27.1	Environmental Justice	Impacts	With the proposed expansion, runway 33L usage--and the resulting noise and air pollution--will triple. It is unfair to require the predominantly working class neighborhoods to the west of Logan to shoulder so much of the burden of the proposed expansion.	<p>The Environmental Justice analysis was significantly expanded in Section 6.8 of the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on Environmental Justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations from the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation.</p> <p>The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. Refer to Section 6.2 and Section 6.8 of the Supplemental DEIS/FEIR, respectively, for additional information on noise impacts and environmental justice.</p>
27.2	Analysis Assumptions	Planning Period	Another major problem with the proposed expansion of Logan is the fact that at best this is a temporary solution to the delay problems there. By 2005 Logan will experience as many, if not more delays than in 1998 with the proposed expansion, according to Massport's own estimates. The short term relief that Massport's expansion proposal would provide does not warrant the permanent loss of quality of life for the residents of the communities to the West of Logan.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented, the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.

Code	Topic 1	Topic 2	Comment	Response
27.3	Regional Transportation	Regional Airports	It is time for the Commonwealth to explore the possibility of expanding one of the regional airports already in existence. This will accomplish two major goals: decreasing demand at Logan and more equitably distributing air traffic throughout the Commonwealth.	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p> <p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful.</p>



COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS SENATE
STATE HOUSE, BOSTON 02133-1053

LETTER 28

SENATOR ROBERT E. TRAVAGLINI

SUFFOLK AND MIDDLESEX
DISTRICT

ROOM 511

TEL. (617) 722-1634

FAX (617) 722-1076

SENATE MAJORITY WHIP

April 22, 1999

Robert Durand, Secretary
of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge St., 20th Fl.
Boston MA 02202

Dear Secretary Durand:

I write to offer comment on Massport's Draft EIR/EIS *Logan Airside Improvements Planning Project - EOE No. 10458*. The purpose of this project is expand operations at Logan International Airport. No matter how many times Massport states otherwise, this project would allow Massport to fly more planes in and out of its facility. The construction of a new runway at Logan Airport does nothing to enhance the quality of the environment, and in truth potentially has the ability to be very destructive. Representations that building the runway is a regional solution fail to ring true as Massport's proposal does not contain a regional airport plan or address the need for increased use of Hanscom Field and Worcester Municipal Airport. It also does not explore any plans for a second major airport within either Massachusetts or the New England region.

Massport, and the administration, should begin by relocating certain existing cargo operations from Logan to Hanscom and to make infrastructure improvements to Worcester Airport that will make both air fields viable alternatives to Logan Airport. In addition, more emphasis should be placed on developing and marketing other airports in the New England area including: New Bedford, Providence RI and Manchester NH.

If runway 14/32 is supposed to be a regional solution, then why is the brunt of airport operations being borne by residents of East Boston, Winthrop, Revere, Chelsea, the South End and South Boston? The real issue is when is enough, enough? The remedies proposed by Massport are stop gap measures that will be meaningless upon completion of the project. The proposal is supposed to assist in reducing delays at Logan airport, yet there is no break down regarding inevitable delays caused by New England weather, nor the delays caused by the airlines themselves which might be solved administratively. Massport's "preferred alternative" instead,

28.1

28.2

pits neighborhood against neighborhood and does not reduce noise but redistributes it temporarily and results in increased noise and operations in the long term.

In the document Massport states that "Alternatives 1 and 1A will allow for increased utilization of Runway 15/33 to levels more consistent with PRAS goals." Then the report goes on to state that the plan would "reduce total population within the most severe noise impact areas (i.e. 70 and 75 DNL contours), but will increase the noise exposed population at 65 dB or greater for all scenarios in comparison to Alternative 4." The No Action scenario appears to have less noise impact on the affected communities than any so-called benefit derived from constructing a new runway. There is also the question of Massport's definition of "noise impact areas", does this refer only to residences located within "noise contour" areas which are defined by Massport and submitted to the FAA or does this reflect residences which are actually receiving high levels of noise which can be documented by actual data? Complaints of increased noise seem to indicate many more residences being impacted than are currently subject to mitigation measures by Massport or located within a "sound contour". 28.3

By their own admission increases in expected passengers traveling through Logan Airport will result in more hours of delay than are experienced today, even with the addition of a new runway. Runway 14/32 does not begin to address the real problem - that Logan Airport is overextended and will not be able to handle the projected number of passengers who wish to fly to Massachusetts. 28.4

I also have many concerns relating to the actual construction of the new runway, the preferred options require a waiver from certain FAA minimum safety requirements. This requires further explanation and Options A and B which impact the Hyatt Harborside Hotel and Boston Harbor, respectively, should not even be on the table. Obviously the physical constraints of building 14/32 should be considered, if you need a waiver maybe it isn't an appropriate idea to build. In addition, throughout the document Massport contends that if the new runway isn't built that Logan will "become an airport that operates primarily in a North-South configuration". This is the current-state of operations at Logan Airport, not something that will be created by an action or inaction on the part of Logan. 28.5

The portion of the DEIS/EIR which discusses cumulative impacts seems to minimize the reality of significant construction occurring in a very small area. The CA/T project will be at peak construction in 2001, with other construction activities happening concurrently with various projects at Logan, which if the project is approved would include construction of 14/32 and construction of the centerfield taxiway. Cumulative truck traffic, even if diverted from local streets, impacts the adjoining residential street network. CA/T and Logan road construction will have a significant impact on how trucks would access the Ted Williams Tunnel and Route 1A (an extremely congested roadway). Without having a better sense of the destination of all the anticipated truck traffic it becomes difficult to assess the impact to air quality from idling and increased congestion on the various roadways to and from Logan. 28.6

The plan also requires that a significant amount of material be excavated totaling 777,000 cubic yards. There is no mention of how stockpiles would be treated, what is Massport's plan to reduce fugitive dust from these materials? The DEIS/EIR does not present a comprehensive 28.7

view of the total amount of excavate generated from the total number of construction projects occurring concurrently, and does not detail the disposal plan. Also, Massport hopes to accomplish most of the major construction on the runway and the centerfield taxiway during the first quarter of 2000 and 2001. Dust control would potentially be dangerous and difficult to achieve with only the use of water. Massport should consider the use of chemical soil stabilizers during these winter months to prevent the accumulation of frozen mud and ice which can be tracked across runways and onto the surrounding roadway system.

I have serious concerns relative to night-time work and would expect that every measure would be taken to reduce noise at the source and would request the use of all appropriate noise mitigation measures, including sound curtains, as needed. It is important that penalties for violating noise levels be included in any contract for any airside improvement project.

28.9

While I am pleased to see that Massport would require a transportation management plan by contractors I am still concerned about construction workers utilizing local streets to park their personal vehicles, especially when working a late shift or weekends. There must be penalties included in any contract to address any potential violations.

28.10

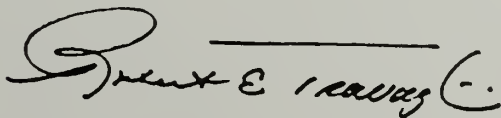
Massport talks about a possible Memorandum of Understanding between impacted communities and the Port Authority to "ensure" that 14/32 is unidirectional and that protections remain in place restricting the use of the runway. An MOU is only as good as the people who craft it, and there is no guarantee that any of the original parties will still be in positions of power in the future when there will be an attempt to lift these restrictions, and there is never any long term guarantee for mitigation.

28.11

In closing, I wish to express my strongest opposition to the proposed Logan Airside Improvements Project, especially the construction of a new runway. I would urge you to reject the Draft EIR/EIS.

Thank you for the opportunity to comment on this proposal. and if I can provide any additional information please do not hesitate to contact me.

Sincerely,



ROBERT E. TRAVAGLINI
Senate Majority Whip

Letter 28

MA State Senator Robert E. Travaglini

Code	Topic 1	Topic 2	Comment	Response
28.1	Regional Transportation	Regional Airports	Massport, and the administration, should begin by relocating certain existing cargo operations from Logan to Hanscom and to make infrastructure improvements to Worcester Airport that will make both air fields viable alternatives to Logan Airport. In addition, more emphasis should be placed on developing and marketing other airports in the New England area including: New Bedford, Providence, RI and Manchester, NH.	<p>cargo operations account for only two percent of aircraft activity at Logan Airport and occur during off-peak hours, cargo operations do not contribute to delays at Logan Airport.</p> <p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with the Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. By its agreement with the City of Worcester, Massport could assume ownership of the Worcester Regional Airport by 2005. On February 1, 2000, Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition, MassHighway is analyzing alternative highway routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport and filed an ENF in December 1999. They have begun the preparation of a Airside Project Draft EIS/EIR for these improvements. In addition, Massport has pursued a variety of initiatives to promote the use of other alternative regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials.</p>

Code	Topic 1	Topic 2	Comment	Response
28.2	Noise	Runway 14/32	If runway 14/32 is supposed to be a regional solution, then why is the brunt of airport operations being borne by residents of East Boston, Winthrop, Revere, Chelsea, the South End and South Boston? Massport's "preferred alternative" instead, does not reduce noise but redistributes it temporarily and results in increased noise and operations in the long term.	The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.
28.3	Noise	Model	Does Massport's definition of "noise impact areas" refer only to residences located within "noise contour" areas which are defined by Massport and submitted to the FAA or does this reflect residences which are actually receiving high levels of noise which can be documented by <u>actual</u> data? Complaints of increased noise seem to indicate many more residences being impacted than are currently subject to mitigation measures by Massport or located within a "sound contour".	<p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the <i>Logan Airport 1999 Environmental Status and Planning Report</i>). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.</p> <p>To the extent that federal regulations permit and that funding is available, the proposed soundproofing program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, but also (ii) those residences that fall within the 1998 65 dB Day-Night Sound Level contour as presented in the <i>Logan Airport 1998 Annual Update</i>. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement soundproofing improvements.</p> <p>While not related to Airside Project impacts, Massport commits to begin discussions with the FAA with the goal of instituting local or national restrictions on the use of hushkitted Stage 3 aircraft at Logan Airport. Massport reports on the status of those consultations in the <i>Logan Airport 1999 Environmental Status and Planning Report</i> (previously GEIR).</p>

Code	Topic 1	Topic 2	Comment	Response
28.4	Alternatives	Runway 14/32	Runway 14/32 does not begin to address the real problem - that Logan Airport is overextended and will not be able to handle the projected number of passengers who wish to fly to Massachusetts.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
28.5	Alternatives	Runway 14/32	Options A and B which impact the Hyatt Harborside Hotel and Boston Harbor, respectively, should not even be on the table.	Refer to Section 3.2 of the Supplemental DEIS/FEIR, which clearly states that Option C is the preferred layout for Runway 14/32.
28.6	Alternatives	Runway 14/32	Massport contends that if the new runway isn't built that Logan will "become an airport that operates primarily in a North-South configuration". This is the current, state of operations at Logan Airport, not something that will be created by an action or inaction on the part of Logan.	Logan Airport currently operated in a north-south configuration 70 percent of the time. Without Runway 14/32, it would operate in a north-south direction more than 90 percent of the time under the future scenarios.
28.7	Construction Period	Other major Projects	The DEIS/EIR discussion of cumulative impacts seems to minimize the reality of significant construction occurring in a very small area. The CA/T project will be at peak construction in 2001, with other construction activities happening concurrently with various projects at Logan, which if the project is approved would include construction of 14/32 and construction of the centerfield taxiway. Cumulative truck traffic, even if diverted from local streets, impacts the adjoining residential street network. CA/T and Logan road construction will have a significant impact on how trucks would access the Ted Williams Tunnel and Route 1A (an extremely congested roadway). Without having a better sense of the destination of all the anticipated truck traffic it becomes difficult to assess the impact to air quality from idling and increased congestion on the various roadways to and from Logan.	The cumulative construction impacts associated with the airside projects occurring simultaneously with the Central Artery/Tunnel (CA/T) construction and other projects at Logan Airport and in East Boston are not anticipated to be significant because of project coordination and mitigation programs that will reduce construction period impacts. The peak cumulative construction traffic would occur in 2003, mostly as a result of concurrent CA/T construction on the airport. Truck traffic associated with construction decreases significantly after 2003 as CA/T construction on the airport is completed. Refer to Section 7.5 of the Supplemental DEIS/FEIR for a discussion of cumulative construction impacts. A discussion of the construction phasing, truck trips, and mitigation measures to be employed during construction of the Preferred Alternative is presented in Section 6.9 of the Supplemental DEIS/FEIR.
28.8	Construction	Soils	The plan also requires that a significant amount of material be excavated totaling 777,000 cubic yards. There is no mention of how stockpiles would be treated, what is Massport's plan to reduce fugitive dust from these materials? The DEIS/EIR does not present a comprehensive view of the total amount of excavate generated from the total number of construction projects occurring concurrently, and does not detail the disposal plan. Also, Massport hopes to accomplish most of the major construction on the runway and the centerfield taxiway during the first quarter of 2000 and 2001. Dust control would potentially be dangerous and difficult to achieve with only the use of water. Massport should consider the use of chemical soil stabilizers during these winter months to prevent the accumulation of frozen mud and ice which can be tracked across runways and onto the surrounding roadway system.	The volume of soil to be excavated has been reduced as a result of the on-going removal of stockpiled CA/T soil material from Governors Island, and the findings of a subsurface investigation program that much of the existing soil material on the airport is suitable for construction and therefore does not have to be removed. Section 6.7 of the Supplemental DEIS/FEIR includes the current project amount of soils to be excavated for offsite disposal and reuse and also discusses recent soil characterization analyses and updates the Draft EIS/ EIR analysis of soil reuse alternatives. Section 7.5 of the Supplemental DEIS/FEIR outlines other construction projects occurring concurrently and Section 8.5 of the Supplemental DEIS/FEIR describes the construction phase mitigation controls to minimize fugitive dust.
28.9	Construction	Noise	I have serious concerns relative to nighttime work and would expect that every measure would be taken to reduce noise at the source and would request the use of all appropriate noise mitigation measures, including sound curtains, as needed. It is important that penalties for violating noise levels be included in any contract for any airside improvement project.	The DEP identifies two criteria against which construction noise can be judged: it cannot increase ambient levels by more than ten dB, and it cannot produce a "pure tone" condition. The analysis of nighttime construction noise levels does not show any significant impact from construction noise, since no pure tone noise is allowed to be emitted from construction equipment such as back-up alarms, as specified in Massport's construction mitigation guidelines.

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WE



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

LETTER 29

ERIC T. TURKINGTON
STATE REPRESENTATIVE
BARNSTABLE, DUKES &
NANTUCKET DISTRICT

BARNSTABLE, CHILMARK, EDGARTOWN
FALMOUTH, GAY HEAD, GOSNOLD
NANTUCKET, OAK BLUFFS, TISBURY
WEST TISBURY & YARMOUTH

Vice Chairman
Committee on Natural Resources
and Agriculture

ROOM 473F, STATE HOUSE
TEL. (617) 722-2210
FAX (617) 722-2339
Rep.EricTurkington@house.state.ma.us

April 6, 1999

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
Cambridge Street, 20th Floor
Boston, MA 02202

Dear Mr. Pugsley,

I am writing in regards to the Massport's Draft Environmental Impact Report/Environmental Impact Statement as it pertains to the Logan Airside Improvements Planning Project.

Although I believe that Massport's preferred alternative is a reasonable response in dealing with Logan's congestion, I am concerned about its decision to keep its option to implement peak period pricing should that become necessary. As Massports' study shows, peak period pricing would have a particularly negative impact on unaffiliated carriers serving the Cape and Islands, since charges could increase by up to 1000% for landing and take-offs during peak-travel times. Unaffiliated carriers would be forced to raise ticket prices by up to 50% or deal with a negative profit margin, which could lead to a reduction of service or even bankruptcy.

29.1

Loss of airline service could further result in job loss, increased traffic congestion, and a crippled tourism industry for Cape Cod and the Islands. As such, peak period pricing should not be implemented.

Sincerely,


ERIC T. TURKINGTON
State Representative

Letter 29

MA State Senator Eric T. Turkington

Code	Topic 1	Topic 2	Comment	Response
29.1	Alternatives	Peak Period Pricing	<p>... I am concerned about ... [Massport's] decision to keep its option to implement peak period pricing should that become necessary. As Massport's study shows, peak period pricing would have a particularly negative impact on unaffiliated carriers serving the Cape and Islands, since charges could increase by up to 1000% for landing and take-offs during peak peak-travel times. Unaffiliated carriers would be forced to raise ticket prices by up to 50% or deal with a negative profit margin, which could lead to a reduction of service or even bankruptcy. Loss of airline service could further result in job loss, increased traffic congestion, and a crippled tourism industry for Cape Cod and the Islands. As such, peak period pricing should not be implemented.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an updated discussion of PPP at Logan Airport and an analysis of the implications of an illustrative conceptual small community exemption program.</p> <p>PPP was included among the Airside Project alternatives to address delays caused by over-scheduling. In the current environment, airline over-scheduling is not a significant contributor to Logan Airport delays and, therefore, PPP was not recommended for immediate implementation. In addition, PPP imposes significant costs on regional airlines and is expected to restrict access to certain markets.</p> <p>The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the 1993 <i>Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This Exemption Program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>



DEPARTMENT OF TRANSPORTATION

16 STATE HOUSE STATION

AUGUSTA, MAINE

04333-0016

ANGUS S. KING, JR.
GOVERNOR

April 20, 1999

JOHN G. MELROSE
COMMISSIONER

LETTER 30

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

The State of Maine Department of Transportation (MDOT) supports Alternative 1A in the recommendations for airside improvements at Logan, but objects strongly to inclusion of Peak Period Pricing (PPP) as an alternative without adequate study of the regional impacts of that policy. While Alternative 1A specifically excludes PPP, the discussion in the second paragraph of the Operational Improvements section of page 8-11 in Volume 1, and the corresponding paragraph on page ES-32 of the Executive Summary, adds the option of implementing PPP at some point in the future. This effectively makes Alternative 1 and Alternative 1A the same.

30.1

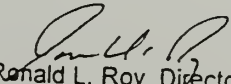
MDOT objection is based on an inadequate evaluation of the regional implications of this option. As noted on page ES-6 of the Executive Summary, "Logan is the gateway to New England, providing a vital link to the national and international air transportation systems. The transportation services provided at Logan - both passenger and air cargo - are essential to the economic success of the entire New England region."

The selections shown in Attachment 1, excerpted from the Draft EIS, point out that PPP: 1) is untried and its effectiveness is unknown, 2) unnecessary, 3) creates an economic burden to operators and passengers from regional markets, and 4) could potentially jeopardize the "transportation services ... essential to the economic success of the entire New England region".

Attachment 2 discusses some of the relevant sections from the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) implementing regulations, and Federal Aviation Administration (FAA) Order 5050.4A, implementing NEPA and the CEQ regulations for FAA which illustrate Maine's position on the inadequacy of the EIS in addressing the impacts of PPP.

The effects of PPP on air travel throughout the New England region must be thoroughly studied before any implementation. As noted in the Draft EIS previous attempts to implement this type of policy at Logan have met with resistance and legal action from regional air carriers and general aviation users. Appropriate study and discussion among the interested parties will provide the best possible solution to access problems at Logan, with the least impact to those affected.

Sincerely,


Ronald L. Roy, Director
Office of Passenger Transportation

Attachment 1, Excerpts from the Draft EIS

PPP is untried and its effectiveness is unknown

Vol 1, Section 3.5 -- "... At present, no airport in the U.S. has imposed such a pricing system." As no foreign operations were evaluated as part of the EIS, we assume no information was available supporting PPP.

PPP is unnecessary

Vol 1, Section 3.5 -- "Current flight activity levels at Logan do not exceed airfield capacity. Airline overscheduling has not been a significant factor in Logan delays since 1993 and is not projected to be a factor in the near-term."

Vol 1, Section 4.5.1 -- "Alternative 1A (all actions except PPP) produces comparable delay savings under the Low Fleet scenarios which closely resemble current conditions at Logan. A comparison of Alternatives 1 and 1A indicates that the incremental contribution of PPP under near-term, low fleet conditions is only 2 percent ... (with a higher threshold than 110 operations the projected delay reduction benefits would be even lower)"

Vol 1, Section 4.6 -- "PPP is designed to reduce delays resulting from airline overscheduling which occurs when flight demand exceeds Logan's normal three-runway capacity of 115 (average over all weather conditions) to 120 (VFR) operations per hour. Current and expected near-term demand patterns at Logan do not exhibit an overscheduling condition. In this environment, PPP would produce marginal delay reduction benefits while imposing economic costs on certain regional carriers and small communities."

PPP creates an economic burden to operators and passengers from regional markets

Vol 1, Section 4.4.5 -- "A peak period surcharge will primarily affect airlines that operate small aircraft."

Vol 1, Section 4.4.5.3 -- "... Regional operations at Logan are expected to be less profitable under the High Fleet scenarios because of greater airline competition"

Vol 1, Section 4.4.6 -- "... The impact of the peak period surcharge will fall most heavily on airlines that operate small aircraft in highly competitive markets."

Vol 1, Section 4.4.7 -- "... The Cape and Islands were selected for special analysis because of the importance of air transportation to their tourist-based economy, their seasonal pattern of service, and their reliance on Boston for connections to the national and international air transportation network. The analysis indicated that the Cape & Island markets are particularly vulnerable to PPP due to their high seasonality and associated reliance on small aircraft. These findings are likely to be equally applicable to other seasonal markets in New England"

Appendix F, Introduction and Background -- "... Carriers operating large jet aircraft would generally experience an overall net reduction in Logan operating fees, while regional carriers would incur an increase in Logan operating costs."

PPP could potentially jeopardize the "transportation services ... essential to the economic success of the entire New England region".

Vol 1, Section 4.4.7 -- "... For Cape Air ... PPP is projected to eliminate its entire profit margin, even under the less severe Low Fleet scenario. The loss of Cape Air services could result in the loss of all scheduled air services for a community like Provincetown, and could produce significant service reductions at other ... markets."

Attachment 1, Excerpts from the Draft EIS (Cont'd.)

Vol 1, Section 4.4.5.3 – "A carrier's decision to cancel flights in response to PPP will depend on the magnitude of profit reduction. The greater the reduction in route profitability, the more likely the carrier will respond by canceling flights."

Vol 1, Section 4.6 -- "... Even after fare increases, the net profit impact is most severe on routes operated with small aircraft, resulting in the highest percentage of forecast cancellations for this market category."

Appendix F, Summary of Findings, Cape Air – "The magnitude of profit reduction associated with the tested pricing structure could jeopardize the viability of Cape Air's Boston services and, potentially, its entire operation."

Appendix F, Summary of Findings, Commutair – "The cost of impacts for Commutair are significant. Operating costs are expected to increase by \$1.1 million to \$1.7 million annually ... Commutair's profits are forecast to decline by approximately \$625,000 to \$935,000 annually ... Commutair is forecast to cancel 2 to 13 daily peak period operations ..."

Appendix F, Introduction and Background – "... This change in the cost structure is forecast to produce a reduction in regional carrier flights at Logan during peak periods In markets experiencing a significant drop in profitability carriers are projected to cancel a portion of their remaining peak period flights."

Appendix F, Characteristics of Regional Carrier Services at Boston – "The historic context demonstrates the fragile operating economics that have characterized Logan's major regional carriers in the recent past. This history also indicates a legitimate basis for concern regarding the possible impacts of PPP on the financial health of Boston's regional carriers."

Appendix G, Potential Impacts of Peak Period Pricing – "... the PPP analysis demonstrates that the air services provided ... could be particularly vulnerable to the impacts of a potential PPP program. The low off-season passenger levels in these markets present difficulties for carriers attempting to provide year-round services with larger regional aircraft. The potential impacts of PPP are especially significant to (small regional carriers), given their high degree of reliance on Boston for access to the national and international air transportation systems."

**Attachment 2, Relevant Selections from NEPA, the CEQ Regulations,
and FAA Order 5050.4A**

NEPA, Section 101 (a) -- Congress . . . declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments . . . to use all practicable means and measures . . . to foster and promote the general welfare . . . and fulfill the social, economic, and other requirements of present and future generations of Americans.

(b) In order to carry out the policy set forth in this Act, it is the continuing responsibility of the Federal Government to use all practicable means . . . to achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities . . .

NEPA, Section 102 -- . . . all agencies of the Federal Government shall --

(C) include in every recommendation or report on proposals for . . . major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on -- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented, and (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity

(D) Any detailed statement required under subparagraph (C) . . . for any major Federal action funded under a program of grants to States shall not be deemed to be legally insufficient . . . if: (iv) the responsible Federal official provides early notification to, and solicits the views of, any other State . . . entity of any action or any alternative thereto which may have significant impacts upon such State . . . entity and, if there is any disagreement on such impacts, prepares a written assessment of such impacts and views for incorporation into such detailed statement.

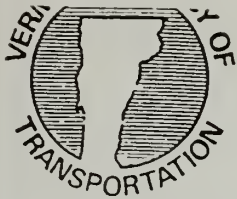
CEQ, 1501.2 -- Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts. Each agency shall: (c) study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources . . .

FAA Order 5050.4A, Paragraph 10.a -- The environmental assessment and consultation process is to provide officials and decision makers, as well as members of the public, with an understanding of the potential environmental impacts of the proposed action.

Letter 30

State of Maine, Dept. of Transportation
Ronald L. Roy, Director,
Office of Passenger Transportation

Code	Topic 1	Topic 2	Comment	Response
30.1	Alternatives	Peak Period Pricing	<p>The State of Maine Department of Transportation (MDOT) supports Alternative 1A in the recommendations for airside improvements at Logan, but objects strongly to inclusion of Peak Period pricing (PPP) as an alternative without adequate study of the regional impacts of that policy. The effects of PPP on air travel throughout the New England region must be thoroughly studied before any implementation. As noted in the Draft EIS previous attempts to implement this type of policy at Logan have met with resistance and legal action from regional air carriers and general aviation users. Appropriate study and discussion among the interested parties will provide the best possible solution to access problems at Logan, with the least impact to those affected.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an updated discussion of PPP at Logan Airport and an analysis of the implications of an illustrative conceptual small community exemption program.</p> <p>The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the <i>1993 Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>



STATE OF VERMONT
AGENCY OF TRANSPORTATION
133 State Street, Administration Building
Montpelier, Vermont 05633-5001



April 21, 1999

LETTER 31

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOEa No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

As directed in Massport's letter of March 4, 1999 and requested in the Joint Massport and FAA letter of February 19, 1999, I am providing the following comments and wish to inform you of our intent to play an active role in the Logan Airside Improvements "Draft EIS/EIR" in as much as it pertains to Peak Period Pricing (PPP).

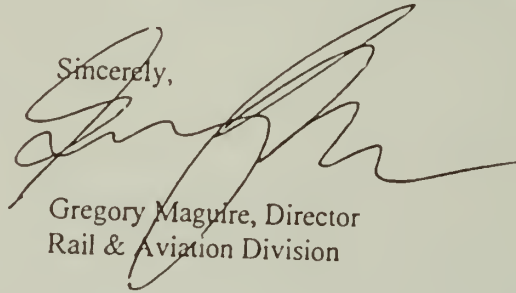
As you know, the PPP issue has been addressed previously and the policy of pricing out smaller aircraft found to be discriminatory by a federal judge in a 1988 Department of Transportation Case Ruling. A second attempt, with a twist in how pricing was applied to get around the ruling, was also dropped along with last years Runway Plan for Logan Airport. Now, PPP appears again as an option in this Draft EIS/EIR. While it is not listed as the "Preferred Option", the discussion in the Operational Improvement Section in Volume I and the corresponding discussion in the Executive Summary does allow for addition of the PPP Option in the future. Also, I have to consider, as you must, that the very active and vocal local groups and politicians opposed not only to increased traffic, but the current level of operations at Logan, could easily move the selection to any of the other alternatives, all of which contain PPP as an option.

I understand the need to pay attention to the views of the residence around Logan, but PPP as an option brings along with it the same discrimination as in the past. The citizens of Northern New England still require convenient, timely and reasonably priced access to the nation's air transportation infrastructure. PPP, whatever the scheme, denies that access. Considering the EIR/EIS acknowledgment that, "Logan is the gateway to New England, providing a vital link to the national and international air transportation system," I find it ironic that PPP is still considered and listed as an option at all in this draft.

Mr. Arthur Pugsley
April 21, 1999
Page 2

I recommend for closure in the Final EIS/EIR, that previous attempts and failures of PPP at Logan be discussed along with its discriminatory nature, and then dropped from alternative consideration in the Final EIS/EIR. In the long run, it is the most effective way to deal with PPP as an issue and would avoid further improvement delay through confrontation or follow on litigation.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Gregory Maguire', written over the typed name and title.

Gregory Maguire, Director
Rail & Aviation Division

cc: MDOT, Ron Roy
NH DOT, Jack Ferns
BTV Airport, J.J. Hamilton
Colgan Airlines, Charles Colgan
Business Express (Delta Connection)
USAIR

31.1

Letter 31

State of Vermont, Agency of Transportation

Gregory Maguire, Director, Rail & Aviation Division

Code	Topic 1	Topic 2	Comment	Response
31.1	Alternatives	Peak Period Pricing	I recommend for closure in the Final EIS/EIR, that previous attempts and failures of PPP at Logan be discussed along with its discriminatory nature, and then dropped from alternative consideration in the Final EIS/EIR. In the long run, it is the most effective way to deal with PPP as an issue and would avoid further improvement delay through confrontation or follow on litigation.	<p>The impacts of the Program for Airfield Capacity Efficiency (PACE) are described and evaluated in Section 3.5.1 of the Supplemental DEIS/FEIR.</p> <p>The PPP program evaluated in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR was designed to comply with pertinent U.S.DOT and federal court precedent in the PACE proceedings and with existing federal regulations regarding airport rates and charges. Revenue neutrality was incorporated in the tested program for this reason. Massport's prior experience with the PACE landing fee structure demonstrates that changes to the existing weight-based landing fees will undergo thorough legal and regulatory review, and that the program must be carefully structured to withstand this process. This was examined in developing the illustrative program.</p>

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BARNSTABLE COUNTY COMMISSIONERS

P.O. BOX 427
BARNSTABLE, MASSACHUSETTS
02630

(508) 362-2511 Ext. 315
FAX (508) 362-4136

HOME RULE CHARTERED
IN 1989

COUNTY COMMISSIONERS:
CHRISTINE DOLEN, Chairman
West Falmouth
MARY J. LECLAIR, Vice Chairman
Marshpee
ROBERT A. O'LEARY
Cummagrud

April 14, 1999

LETTER 32

John Silva
Manager, Environmental Program
Airports Division
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Mr. Silva:

The purpose of this letter is to provide comment on the Draft Environmental Impact Report/Statement (DEIR/S) for the Logan Airside Improvements Planning Project. The Barnstable County Commissioners represent the people on Cape Cod.

In response to environmental, economic, and other quality of life concerns, Barnstable County has adopted policies to increase year-round transportation options and reduce reliance on automobiles. The success of these policies is central to the quality of life on Cape Cod. It is also necessary for the sustainability of the Cape's tourism industry, as well as public and private efforts to broaden and diversify the regional economy and create year-round employment opportunities.

Access to Logan airport is an important element in the Cape's transportation network. Via Logan, visitors can reach the Cape without adding to the existing congestion along the southeast expressway, Route 3 or Route 6. Access to Logan is increasingly important to a growing number of businesses on the Cape which are helping to create quality employment opportunities for residents.

The safe and efficient operation of Logan is an important issue to residents of Barnstable County. The Commissioners agree that Alternative 1A., expressed by Massport as the Preferred Alternative, is a reasonable response to current and projected delay conditions at Logan and offers the greatest potential for maintaining a high level of operating efficiency.

It is our understanding that, although peak period pricing is not included in the Preferred Alternative, it is still presented as a policy for possible future use. The Barnstable County Commissioners continue to oppose peak period pricing because it would eliminate access to Logan by carriers now serving the region. Loss of air transportation would be contrary to the county's

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transportation, economic development and environmental policies, and would result in significant losses of jobs and business opportunities and would cause hardship for residents who rely on frequent affordable access to Boston for business, medical care and other purposes. The loss of air travel would also force people to use their cars, thereby adding to congestion on roadways and degrading air quality.

Thank you for the opportunity to comment on the Logan DEIR/S. If you have any questions on our comments, please do not hesitate to call the County Commissioners Office (508) 375-6635.

Sincerely,



Christine Dolen
Chairman

Mary McClair
Vice Chairman



Robert O'Leary
Commissioner

Copies to The Honorable A. Paul Cellucci
State Senator Henri Rauschenbach
State Senator Therese Murray
State Representative Eric Turkington
State Representative Shirley Gomes
State Representative Ruth Provost
State Representative Demetrius Atsalis
State Representative Thomas George
State Representative Nancy Caffyn

Letter 32

Barnstable County County Commissioners

Christine Dolen, Chairman

Mary LeClair, Vice Chairman

Robert O'Leary, Commissioner

Code	Topic 1	Topic 2	Comment	Response
32.1	Ground Transportation	Access to Logan Airport	Access to Logan Airport is an important element in the Cape's transportation network. Via Logan, visitors can reach the Cape without adding to the existing congestion along the southeast expressway, Route 3 or Route 6. Access to Logan is increasingly important to a growing number of businesses on the Cape which are helping to create quality employment opportunities for residents.	Comment noted.
32.2	Alternatives	Preferred Alternative	The Commissioners agree that Alternative 1A ... the Preferred Alternative, is a reasonable response to current and projected delay conditions at Logan and offers the greatest potential for maintaining a high level of operating efficiency.	Comment noted.
32.3	Alternatives	Peak Period Pricing	The Barnstable County Commissioners continue to oppose peak period pricing because it would eliminate access to Logan by carriers now serving the region. Loss of air transportation would be contrary to the county's transportation, economic development and environmental policies, and would result in significant losses of jobs and business opportunities and would cause hardship for residents who rely on frequent affordable access to Boston for business, medical care and other purposes.	<p>The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the 1993 <i>Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This Exemption Program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>



CAPE COD COMMISSION

3225 MAIN STREET
P.O. BOX 226
BARNSTABLE, MA 02630
(508) 362-3828
FAX (508) 362-3136
E-mail: frontdesk@capecodcommission.org

LETTER 33

April 22, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attention: Arthur Pugsley, MEPA Unit

EOEA #10458

John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Sirs:

The Cape Cod Commission has discussed the "Logan Airside Improvements Planning Project" draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We concur with the findings and conclusions in the report that Peak Period Pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport. Peak Period Pricing should only be considered at airports when scheduling or capacity is the primary cause of delays. The aircraft delays at Logan Airport are usually due to wind, not airfield capacity. Therefore, any alternatives that include Peak Period Pricing should be eliminated from further consideration.

Air travel between Cape Cod and Logan Airport is a vital part of the Cape's transportation system. Peak Period Pricing, if implemented, would create a severe hardship on airlines such as Cape Air that use small aircraft. There is a strong possibility that Peak Period Pricing at Logan Airport would force Cape Air to discontinue operations. This would have a devastating impact on Cape Cod. It would further isolate towns such as Provincetown, where the only year-round alternative to a 25 minute flight to Boston is a 3 hour trip by automobile or bus. It would also increase automobile travel between Cape Cod and Boston, adding to congestion at the Bourne and Sagamore Bridges, on Route 3 and Route 6. In addition, we understand that scheduled air service to Provincetown Airport, within the Cape Cod National Seashore, is allowed by the National Park Service on the condition that continuous service be maintained. Therefore, once air service between Cape Cod and Logan Airport is lost, some of it may never be restored.

33.1

Secretary Robert Durand
Mr. John Silva
April 22, 1999
Page 2

Ironically, although Cape Air stands to suffer the most from Peak Period Pricing, the airline has little impact on current and expected future operations at Logan Airport. That is because Cape Air's small aircraft are able to land on runway 15L/33R, which is too short for most other regional carriers and is under utilized.

If the analysis presented in the draft EIS/EIR is accurate, then it appears that Alternative 1A (all actions except Peak Period Pricing) could provide a benefit in terms of equitable noise distribution and relief in aircraft delay. We would support Alternative 1A if it does have these benefits.

33.2

Thank you for the opportunity to comment on this report.

Sincerely,



Herbert Olsen
Chairman
Cape Cod Commission

cc: Honorable A. Paul Cellucci, Governor
Mr. Peter Blute, Massachusetts Port Authority
Mr. Mark Robinson, Chairman, Massport Board of Directors
Massachusetts Congressional Delegation
Cape Cod Delegation to the Massachusetts General Court
Cape Cod Boards of Selectmen
Barnstable Town Council
Cape Cod Economic Development Council
Cape Ports



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April 22, 1999

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Secretary Robert Durand
Mr. John Silva
April 22, 1999
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Sincerely,



Herbert Olsen
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cc: Honorable A. Paul Cellucci, Governor
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Massachusetts Congressional Delegation
Cape Cod Delegation to the Massachusetts General Court
Cape Cod Boards of Selectmen
Barnstable Town Council
Cape Cod Economic Development Council
Cape Ports

Letter 33

Cape Cod Commission

Herbert Olsen, Chairman

Code	Topic 1	Topic 2	Comment	Response
33.1	Alternatives	Peak Period Pricing	The Cape Cod Commission ...concurs with the findings and conclusions in the report that Peak Period pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport. ...Any alternatives that include Peak Period Pricing should be eliminated from further consideration.	Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. This Exemption Program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.
33.2	Alternatives	Preferred Alternative	If the analysis presented in the draft EIS/EIR is accurate, then it appears that Alternative 1A (all actions except Peak Period Pricing) could provide a benefit in terms of equitable noise distribution and relief in aircraft delay. We would support Alternative 1A if it does have these benefits.	Comment noted.



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E-mail: frontdesk@capecodcommission.org

LETTER 34

April 13, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attention: Arthur Pugsley, MEPA Unit

EOEA #10458

John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Sirs:

The Cape Cod Commission transportation committee has discussed the "Logan Airside Improvements Planning Project" draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We concur with the findings and conclusions in the report that Peak Period Pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport. Peak Period Pricing should only be considered at airports when scheduling or capacity is the primary cause of delays. The aircraft delays at Logan Airport are usually due to wind, not airfield capacity. Therefore, any alternatives that include Peak Period Pricing should be eliminated from further consideration.

34.1

Air travel between Cape Cod and Logan Airport is a vital part of the Cape's transportation system. Peak Period Pricing, if implemented, would create a severe hardship on airlines such as Cape Air that use small aircraft. There is a strong possibility that Peak Period Pricing at Logan Airport would force Cape Air to discontinue operations. This would have a devastating impact on Cape Cod. It would further isolate towns such as Provincetown, where the only year-round alternative to a 25 minute flight to Boston is a 3 hour trip by automobile or bus. It would also increase automobile travel between Cape Cod and Boston, adding to congestion at the Bourne and Sagamore Bridges, on Route 3 and Route 6. In addition, we understand that scheduled air service to Provincetown Airport, within the Cape Cod National Seashore, is allowed by the National Park Service on the condition that continuous service be maintained. Therefore, once air service between Cape Cod and Logan Airport is lost, some of it may never be restored.

Secretary Robert Durand
Mr. John Silva
April 13, 1999
Page 2

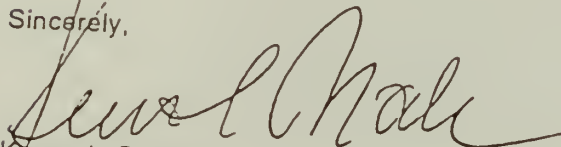
Ironically, although Cape Air stands to suffer the most from Peak Period Pricing, the airline has little impact on current and expected future operations at Logan Airport. That is because Cape Air's small aircraft are able to land on runway 15L/33R, which is too short for most other regional carriers and is under utilized.

If the analysis presented in the draft EIS/EIR is accurate, then it appears that Alternative 1A (all actions except Peak Period Pricing) could provide a benefit in terms of equitable noise distribution and relief in aircraft delay. We would support Alternative 1A if it does have these benefits.

34.2

Thank you for the opportunity to comment on this report.

Sincerely,



Kenneth Brock

Chair

Cape Cod Commission Transportation Committee

cc: Honorable A. Paul Cellucci, Governor
Mr. Peter Blute, Massachusetts Port Authority
Mr. Mark Robinson, Chairman, Massport Board of Directors
Massachusetts Congressional Delegation
Cape Cod Delegation to the Massachusetts General Court
Cape Cod Boards of Selectmen
Barnstable Town Council
Cape Cod Economic Development Council
Cape Ports

Letter 34

Cape Cod Commission Transportation Committee

Kenneth Brock, Chair

Code	Topic 1	Topic 2	Comment	Response
34.1	Alternatives	Peak Period Pricing	The Cape Cod Commission transportation committee ... concurs with the findings and conclusions in the report that Peak Period pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport. Any alternatives that include Peak Period Pricing should be eliminated from further consideration.	<p>The potential impact of PPP on the fleet mix at Logan Airport is discussed in Section 4.5.2 of the Supplemental DEIS/FEIR. Section 4.5.3 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program. Previous attempts at differential landing fee programs at Logan Airport and the analysis presented in the <i>1993 Strategic Assessment Report</i> are described in Section 3.5 of the Supplemental DEIS/FEIR.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This Exemption Program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>
34.2	Alternatives	Preferred Alternative	If the analysis presented in the draft EIS/EIR is accurate, then it appears that Alternative 1A (all actions except Peak Period Pricing) could provide a benefit in terms of equitable noise distribution and relief in aircraft delay. We would support Alternative 1A if it does have these benefits.	<p>PRAS was established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations.</p> <p>During very high demand periods, the controllers have little or no flexibility for runway selection. Unidirectional Runway 14/32 would give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals by redirecting many flights to overwater routes. The addition of Runway 14/32 is the single most important mechanism to achieve equitable geographic distribution of aircraft operations and noise.</p> <p>Runway 14/32 and all other airside improvements would reduce current and future delays and enhance safety. The sooner that these improvements are implemented, the more long-term delay benefits will be realized.</p>





Metropolitan Area Planning Council

60 Temple Place, Boston, MA 02111 617/451-2770 Fax: 617/482-7185 Internet: www.mapc.org

Serving 101 cities and towns in metropolitan Boston

LETTER 35

April 22, 1999

The Honorable Robert Durand, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

Project Name: Logan Airside Improvements Planning Project
MEPA #: 10458 DEIR/DEIS

Dear Secretary Durand,

The Metropolitan Area Planning Council regularly reviews proposals deemed to have regional impacts. These proposals are reviewed for compliance with MetroPlan 2000, the regional plan for the Boston metropolitan area, as well as for their impact upon the environment. The Council encourages MEPA to ensure that proposed development scenarios and mitigation plans comply with MetroPlan 2000.

As Massport is not subject to local zoning regulations, MAPC suggests MEPA assume some of the responsibility of reviewing the full context of impacts to the region, beyond those associated strictly with the site-specific environmental impacts from the proposed activities. This is specifically important given the regional nature of airports, and the regional nature of the impacts associated with the operations of such a transportation hub used by millions of people annually.

Massport has prepared two separate MEPA documents: a GEIR which has focused primarily on landside development and impacts; and the more recent DEIS/DEIR for proposed airside development plans and associated impacts. Given the enormity of the impacts associated with any operational change at a regional airport such as Logan; economic, environmental quality, transportation, and even social, such an approach was acceptable. However, as the proposed improvements have become more specific and less generalized, the integral tie between airside and landside activities must be addressed. Only by viewing the landside impacts side by side with the correlating airside modifications, can decisions regarding costs and benefits as well as appropriateness of mitigation measures be made. This analysis should be a requisite part of any following FEIR.

It is immediately apparent that Logan Airport plays a vital role in the economy of Boston, and the New England area. The volume of people, goods and services moving to and through this facility is substantial, and the efficiency of this movement is key to the success of the operations of all subsequent and associated businesses. Furthermore, the dependability and reliability of air services plays an important role in where major businesses decide to locate. Accordingly,

changes in the operations of the airport must be seen in view of these far-reaching impacts. Setting aside the issue of the new runway, MAPC has focused its comments on the regional impacts stemming from the growing use of Logan Airport and its effects on the regional transportation infrastructures.

Given the projection that passenger use will increase from 29 to 45 million within 10 years, a 55% increase, it can be assumed that the movement of these people to the airport itself is as important as the movement of the passengers and plane through the airport system. The current roadway and transit systems available to move people to and through Boston often operate at capacity under today's conditions. It is vital that this situation be addressed – by Massport, by MassHighway, and by the MBTA. There must be a regional strategy developed which is both multi-modal and multi-airport. This comprehensive strategy needs to determine how much growth is going to occur in air traffic at each airport, how much ground traffic will be generated, and how this ground traffic will be accommodated by existing roadways, transit and even parking.

35.1

The two submitted documents (GEIR and the DEIS/DEIR) present the following noteworthy facts regarding the use of the airport facilities. This information indicates that Logan Airport is responsible for consuming much of the capacity of the existing transportation infrastructure.

- Logan Airport serviced 26.5 million passengers in 1998, and anticipates demand to reach 45 million passengers by the year 2010.
- Logan Airport is almost exclusively an origin and destination airport: almost 90% of Logan passengers begin or end their trip at Logan, with only 10% of passengers connecting between flights.
- Nearly 80% of Logan's demand is drawn from the region within the Route 495 corridor.
- Auto is, and will continue to be, the predominant mode of travel between the New England regional airport service areas and Boston.
- Nearly half of the 5,000,000 regional airport passengers that drive to Logan are closer to Manchester airport, and almost 1/3 are from the Worcester Airport service area.
- Passengers that might be served from a regional airport but instead drive to Logan for air service offer the greatest potential for Logan passenger diversion.
- While the regional alternatives alone cannot eliminate airside congestion, they can alleviate the delays experienced at Logan by achieving a better distribution of the region's intercity travel demand.
- 1 out of 3 people traveling to Logan get there by public transportation.
- For every 1% increase in HOV ridership, traffic on airport roadways goes down about 1,000 cars per day.
- The anticipated level of potential air passenger diversion to other airports or other methods of transportation (including video conferencing) represents 16-19% of Logan Airport's forecast demand.

Massport may be the greatest vehicle trip generator in the Boston area. The GEIR states that Massport is developing an Airport Intermodal Transit Connector (AIRC), and anticipates that ridership of public transit will double due to the proposed improvements. Any future FEIR should specify the methods which Massport will use to guarantee this. It implies a considerable level of cooperation between the agencies responsible for managing the transportation infrastructure – Massport, MassHighway, MBTA, FHWA, and Amtrak.

35.2

Massport should be commended for their efforts in developing private vendor partnerships to improve access to/from areas such as Braintree and Newton. Massport's support of alternative

fuel vehicles and transportation demand management (TDM) is also laudable. The effectiveness of these transportation alternatives should be discussed in the FEIR, as should the possibility of beginning other public transit routes. The opening of the Woburn Intermodal Transportation Center is planned to coincide with the closing of the Mishawum Commuter Rail Station and the neighboring Logan Express facility. The FEIR should include an analysis of ridership impact due to this closure on the northwest segment of the region, since travelers on Route 128 from the east and west will have to go north on I-93 to use the new Woburn service. We are also pleased to note that Massport will expand the Logan Express services to Cape Cod and encourage Massport to examine additional locations for Express services from current and planned park and ride lots. Efforts to limit/reduce the number of vehicles travelling to/from the airport proper should not only be explained in the FEIR, but the availability of adequate funding to support these efforts should be presented as well.

35.3

The work associated with the Route 495 Initiative should be incorporated in further documents prepared to address impacts and mitigation plans for the Airport plans. According to the Massachusetts Department of Revenue, the cities and towns along the 495 corridor exhibit the greatest amount of revenues attributable to new growth in 1996, 1997, and 1998. Furthermore, these areas exhibit the highest levels of employment and population change (1990-1995), and it is anticipated that this trend will continue in the future. The economic development around this area may be sufficient to support greater changes to the Worcester Airport than currently planned. Unfortunately, there are currently only five commuter rail trips to Worcester each day. As Massport plans to gain control of the operations of the Worcester Airport, they should consider modifications which would make this airport more accessible and convenient. For example, the existing transit schedule is insufficient to support growth at the Worcester airport. Such modification may include working with MassHighway and the MBTA to improve direct access to the airport, making the airport capable of supporting jet airplanes, and even encouraging airlines to relocate to this facility. As stated in the GEIR, the success of a multi-airport transportation system is dependent on equitable distribution of services - both air and ground related. Creating such equitable services would result in diverting considerable vehicular traffic away from the central Boston area and improving the efficiency of movement throughout the area.

35.4

The Boston Convention Center and the proposed Commonwealth Flats Development Area are only two of the proposed developments occurring in South Boston. Like the I-495 corridor, this area too is bound for considerable growth - business, commercial, residential and even industrial. The FEIR should address the applicability of the proposed South Boston Piers Transitway in providing access to this area.

35.5

In summary, MAPC requests the Secretary require the proponent to address the requirements of agency analysis under Executive Order 385, and that the FEIR include a full description of the impacts on the transportation infrastructure as well as identify the measures proposed to mitigate such impacts. More specifically, the following issues should be considered:

Impact Analysis:

- An indirect access (such as from Route 1A) permit should be required from the Massachusetts Highway Department.
- Massport should conduct a regional traffic analysis; including a passenger origination study which identifies locations at the regional/local level as opposed to the New England area level; a Level Of Service (LOS) analysis comparing resulting conditions to existing background conditions as well as to a background which includes known

35.6

35.7

development projects such as the Convention Center; an intersection analysis focusing on areas such as the ramp to the tunnel and several off-ramps from I-93; and a build analysis which examines the incremental changes in traffic flow resulting from incremental phases of the airport's improvement plan.

- A draft Section 61 finding from Mass Highway should be included in the FEIR.

35.8

Mitigation Analysis:

- Massport should identify its proposed passenger demand management/reduction and/or capacity improvement plans such as differential tolls for single occupancy vehicles at the tunnels and bridge; subsidized parking rates at peripheral sites and increased parking rates at the airport; increased assistance in existing regional airport corridor expansion; and increased assistance with and access to the passenger rail in the northeast corridor.
- Massport should identify their level of commitment to aiding in the management of the regional transportation infrastructure. For example - MBTA improvements such as the urban ring and station locations in an amount corresponding to the amount committed to the artery/tunnel project; locations for proposed new park-and-flies; and relocation of car rental facilities to off-site areas with corresponding shared transit to these areas.
- The FEIR should present any discussions regarding the effect of recent bond reauthorization legislation submitted by the administration which may reduce highway project dollars for projects in the Logan expansion impact area.

35.9

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35.11

Comprehensive analysis of passenger delays is clearly a role of Massport. The fact that the delay often begins far from the airport should be just as relevant to Massport, and thus justify their involvement in managing the region's transportation infrastructure.

Thank you for the opportunity to comment.

Sincerely,



David C. Soule
Executive Director

Letter 35

Metropolitan Area Planning Council

David C. Soule, Executive Director

Code	Topic 1	Topic 2	Comment	Response
35.1	Regional Transportation	Regional Airports	There must be a regional strategy developed which is both multi-modal and multi-airport. This comprehensive strategy needs to determine how much growth is going to occur in air traffic at each airport, how much ground traffic will be generated, and how this ground traffic will be <u>accommodated</u> by existing roadways, transit and even parking.	<p>Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.</p> <p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 Environmental Status and Planning Report</i> (previously GEIR) and its subsequent annual updates (Environmental Data Reports).</p>
35.2	Ground Transportation	Access to Logan Airport	The GEIR states that Massport is developing an Airport Intermodal Transit Connector (AITC), and anticipates that ridership of public transit will double due to the proposed improvements. Any future FEIR should specify the methods which Massport will use to guarantee this. It implies a considerable level of cooperation between the agencies responsible for managing the transportation infrastructure-Massport, MassHighway, MBTA, FHWA, and Amtrak.	Massport is working with the MBTA to improve transit access to Logan Airport via the Blue Line and the Airport Intermodal Transit Connector (AITC). Section 2.7 of the Supplemental DEIS/FEIR discusses the proposed MBTA improvements in transit access to Logan Airport. The <i>Logan Airport 1999 ESPP</i> (previously GEIR), reports on the status of these ground transit improvement projects.

Code	Topic 1	Topic 2	Comment	Response
35.3	Ground Transportation	Mitigation	Massport should be commended for their efforts in developing private vendor partnerships to improve access to/from areas such as Braintree and Newton. Massport's support of alternative fuel vehicles and transportation demand management (TDM) is also laudable. The effectiveness of these transportation alternatives should be discussed in the FEIR, as should the possibility of beginning other public transit routes. The opening of the Woburn Intermodal Transportation Center is planned to coincide with the closing of the Mishawum Commuter Rail Station and the neighboring Logan Express facility. The FEIR should include an analysis of ridership impact due to this closure on the northwest segment of the region, since travelers on Route 128 from the east and west will have to go north on I-93 to use the new Woburn service. We are also pleased to note that Massport will expand the Logan Express services to Cape Cod and encourage Massport to examine additional locations for Express services from current and planned park and ride lots. Efforts to limit/reduce the number of vehicles travelling to/from the airport proper should not only be explained in the FEIR, but the availability of adequate funding to support these efforts should be presented as well.	The Logan Airside Supplemental DEIS/FEIR discusses impacts of the proposed airside improvements. Refer to the <i>Logan Airport 1999 ESPR</i> for a discussion of ground access options including the Woburn Intermodal Transportation Center and Logan Express services.
35.4	Regional Transportation	Regional Airports	As Massport plans to gain control of the operations of the Worcester Airport, they should consider modifications which would make this airport more accessible and convenient.	The MassHighway is analyzing alternative routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport. MassHighway is in the process of preparing the EIS/EIR for these highway improvements. Massport supports this project.
35.5	Ground Transportation	Access to Logan Airport	The FEIR should address the applicability of the proposed South Boston Piers Transitway in providing access to this area.	The Airside project does not result in additional demand for ground access services.
35.6	Ground Transportation	Access to Logan Airport	An indirect access (such as from Route 1A) permit should be required from the Massachusetts Highway Department.	The Airside project does not result in additional demand for ground access services.

Code	Topic 1	Topic 2	Comment	Response
35.7	Ground Transportation	Studies	Massport should conduct a regional traffic analysis; including a passenger origination study which identifies locations at the regional/ local level as opposed to the New England area level; a Level of Service (LOS) analysis comparing resulting conditions to existing background conditions as well as to a background which includes known development projects such as the Convention Center; an intersection analysis focusing on areas such as the ramp to the tunnel and several off-ramps from I-93; and a build analysis which examines the incremental changes in traffic flow resulting from incremental phases of the airport's improvement plan.	<p>Massport, as a matter of course, has monitored and reported on the vehicle trip generating characteristics of Logan Airport in its various environmental filings including the annual GEIR/Annual Updates documents. It has also projected vehicle trip generation estimates for an annual airport activity level of 37.5 million air passengers, and has analyzed the impacts measured and projected airport-related traffic for three different study areas (on-airport, East Boston, and regional). The results of these analyses were presented in the Logan International Airport Generic Environmental Impact Report filed with MEPA in July of 1996 (EOEA #3247/5146). Since that time, Massport has monitored traffic activity levels at Logan Airport and have reported average annual daily traffic (AADT) and average annual weekday traffic (AWDT) annually.</p> <p>Level of service analyses have been conducted for many intersections in East Boston and Massport has worked with the community to identify potential improvements. Additionally, Airport-related trip generation estimates have been incorporated into the traffic models used by the Central Artery/Tunnel (CA/T) Project that were integral to the design of CA/T Project roadways including the I-90 extension (TWT) and the I-90/Route 1A connections in East Boston.</p> <p>Estimates of Logan Airport-related trip generation have also been included in the Boston Metropolitan Area regional transportation model maintained by the Central Planning Staff. Vehicle trip origins and destinations are assigned to the respective traffic zones based on town level origin and destination data collected through Massport tri-annual air passenger surveys. As a result, Logan Airport-related vehicle trips are included as part of the regional baseline and all future condition traffic analyses prepared by Central Transportation Planning Staff (CTPS) in a manner consistent with vehicle trip generation characteristics of the Boston central business district (CBD) and other distinct trip generators in the region.</p> <p>In addition to the comprehensive evaluation of Logan Airport-related traffic impacts presented in annual environmental filings by Massport, or other project sponsor, also prepares project-specific traffic impacts of on-airport actions that cross MEPA filing thresholds. Examples include Environmental Assessments (EAs) and Environmental Impact Reports (EIRs) for the West Garage project, the International Gateway project, the Terminal A project, Cargo Building 63, the Logan Office Center Garage, the Hilton Hotel, etc. Each of these projects assess the traffic impacts (including construction-related traffic impacts) of the proposed project and develops appropriate levels of mitigation that are included in the project's Section 61 finding. See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.</p>
35.8	Ground Transportation	Mitigation	A draft Section 61 finding from Mass Highway should be included in the FEIR.	Draft Section 61 Findings are in Section 8.7 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
35.9	Ground Transportation	Traffic	Massport should identify its proposed passenger demand management/reduction and/or capacity improvement plans such as differential tolls for single occupancy vehicles at the tunnels and bridge; subsidized parking rates at peripheral sites and increased parking rates at the airport; increased assistance with and access to the passenger rail in the northeast corridor.	<p>Massport has in place an extensive Ground Access Management Plan, the primary goals of which are to: increase the overall efficiency of the metropolitan transportation system through interagency coordination; increase annual air passenger HOV mode share to 35.2 percent by the time annual air passengers reach 37.5 million; reduce employee reliance on commuting alone by private automobile; provide adequate long-term parking within the limits of the Logan Airport Parking Freeze; and improve management of ground access and infrastructure through technology.</p> <p>Key achievements in reaching those goals include:</p> <p>Establishment of the Logan Airport Transportation Management Association (TMA). Massport provided subsidies for TMA members on Logan Express and MBTA. TMA members ride the Rowe's Wharf Water Shuttle for free; hired professional TMA firm to operate the Logan Airport TMA.</p> <p>Record ridership on the Logan Express bus service (exceeded over one million passengers in 1998 and 1999) and planning for a fourth Logan Express location.</p> <p>Construction of the Woburn Regional Transportation Center which will include 900 new parking spaces for Logan Express (construction completed in 2000)</p> <p>Planning for the Airport Intermodal Transit Connector which will provide a direct link between Logan Airport and South Station/Red Line. Initiation of the Logan DART bus service between Logan Airport and South Station.</p> <p>Participation with the MBTA in planning for the redesigned new Airport Station to include wide escalators, flight information monitors, and other air passenger amenities.</p> <p>Continued the operation of free shuttle buses between Airport Station, Water Shuttle dock, and terminals.</p> <p>Provided a dedicated DART bus dock at South Station with direct service to the airport.</p> <p>Implemented Logan Direct service from the South Shore.</p> <p>Continued marketing and advertising of HOV services through use of 1-800-23LOGAN telephone service and other media.</p> <p>Continued implementation of commercial vehicle lane, Neptune Road exit ramp peak period forced turnaround, local street closures, and traffic volume restrictions at Maverick Street. Continued traffic monitoring, curbside monitoring, and traffic control improvements.</p> <p>Continued development effort for Advanced Traveler Information Systems and Automatic Vehicle Identification (AVI) to monitor commercial vehicle activity.</p> <p>Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan.</p>

Code	Topic 1	Topic 2	Comment	Response
35.10	Ground Transportation	Access to Logan Airport	Massport should identify their level of commitment to aiding in the management of the regional transportation infrastructure. For example- MBTA improvements such as the urban ring and station locations in an amount corresponding to the amount committed to the artery/tunnel project; locations for proposed new park-and-flys; and relocation of car rental facilities to off-site areas with corresponding shared transit to these areas.	<p>Massport is considering consolidation of car rental facilities, which will facilitate the consolidation of the courtesy vehicles serving the rental car companies.</p> <p>Massport is working with the MBTA to improve transit access to Logan Airport via the Blue Line and the Airport Intermodal Transit Connector (AITC). Section 2.7 of the Supplemental DEIS/FEIR discusses the proposed MBTA improvements in transit access to Logan Airport. The <i>Logan Airport 1999 ESPR</i> (previously GEIR), reports on the status of these ground transit improvement projects.</p> <p>Massport is constantly striving to make Logan Airport a more efficient transportation center with less impact on surrounding communities by improving mass transit access to Logan Airport. The Airside Project makes Logan Airport more efficient and will not affect vehicle traffic, transit systems or major roadway intersections. The Supplemental DEIS/FEIR discusses all the environmental impacts from the Airside Project. The ESPR/GEIR and its Annual Updates discuss Massport's efforts to lessen Logan Airport's total environmental footprint, especially impacts from ground access.</p>
35.11	Ground Transportation	Mitigation	The FEIR should present any discussions regarding the effect of recent bond reauthorization legislation submitted by the administration which may reduce highway project dollars for projects in the Logan expansion impact area.	The Supplemental DEIS/FEIR responds fully to the EOECA Certificate of May 7, 1999.



CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
THOMAS M. MENINO

April 7, 1999

The Hon. Robert A. Durand
Secretary of Environmental Affairs
Attention MEPA Office
100 Cambridge Street, 20th Floor
Boston, MA 02205

LETTER 36

Dear Secretary Durand:

The Massachusetts Port Authority projects that passenger traffic at Logan Airport will grow from 26 million in 1998 to as many as 45 million by 2010, an increase of roughly 73 percent.

More passenger traffic at Logan Airport will only mean more cars, trucks and shuttle buses on our congested highways and urban road system. During peak travel times, this could make traffic congestion unbearable on the Southeast Expressway and Route 1A. It will also encourage more drivers to seek alternate routes, worsening congestion on roads such as Storrow Drive.

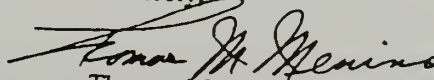
The majority of Logan's users actually come from beyond Route 128, according to Massport's 1996 data. These people are not getting to Logan via the Blue Line. They are driving long distances for great lengths of time on congested roads. As traffic at Logan expands, road traffic congestion will grow worse, more vehicles will slow to a crawl, and suburban travelers may not be able to get to Logan on time.

Putting more traffic on our urban road system during peak travel times raises the issue of whether residents near Logan Airport will be able to navigate their own communities and whether employees will be able to travel to and from work without further delays.

Finally, the addition of more vehicles to our roads raises concerns about environmental and economic impacts of traffic congestion, from air pollution to lost time and productivity. The region is already in "serious" non-attainment of the air quality standard for ozone, according to the U.S. Environmental Protection Agency.

Massport's Environmental Impact Statement/Report addresses none of this. It is incomplete, because it avoids the landside impacts of airport growth. Airside and landside impacts are related and inseparable. I therefore respectfully request that you require the Port Authority to provide a full and complete accounting of all the landside impacts of its improvement plan before proceeding any further. To do so would only deny the people of greater Boston the answers we deserve.

Sincerely,


Thomas M. Menino

36.1

Letter 36

City of Boston

Honorable Mayor Thomas M. Menino

Code	Topic 1	Topic 2	Comment	Response
36.1	Ground Transportation	Access to Logan Airport	<p>More passenger traffic at Logan Airport will only mean more cars, trucks and shuttle buses on our congested highways and urban road system. During peak travel times, this could make traffic congestion unbearable on the Southeast Expressway and Route 1A. It will also encourage more drivers to seek alternate routes, worsening congestion and roads such as Storrow Drive.</p> <p>... As traffic at Logan expands, road traffic congestion will grow worse, more vehicles will slow to a crawl, and suburban travelers may not be able to get to Logan on time.</p> <p>...the addition of more vehicles to our roads raises concerns about environmental and economic impacts of traffic congestion, from air pollution to lost time and productivity.</p>	<p>Massport has in place an extensive Ground Access Management Plan, the primary goals of which are to: increase the overall efficiency of the metropolitan transportation system through interagency coordination; increase annual air passenger HOV mode share to 35.2 percent by the time annual air passengers reach 37.5 million; reduce employee reliance on commuting alone by private automobile; provide adequate long-term parking within the limits of the Logan Airport Parking Freeze; and improve management of ground access and infrastructure through technology.</p> <p>Key achievements in reaching those goals include:</p> <p>Establishment of the Logan Airport Transportation Management Association (TMA). Massport provided subsidies for TMA members on Logan Express and MBTA. TMA members ride the Rowe's Wharf Water Shuttle for free; hired professional TMA firm to operate the Logan Airport TMA.</p> <p>Record ridership on the Logan Express bus service (exceeded over one million passengers in 1998 and 1999) and planning for a fourth Logan Express location.</p> <p>Construction of the Woburn Regional Transportation Center which will include 900 new parking spaces for Logan Express (construction completed in 2000)</p> <p>Planning for the Airport Intermodal Transit Connector which will provide a direct link between Logan Airport and South Station/Red Line. Initiation of the Logan DART bus service between Logan Airport and South Station.</p> <p>Participation with the MBTA in planning for the redesigned new Airport Station to include wide escalators, flight information monitors, and other air passenger amenities.</p> <p>Continued the operation of free shuttle buses between Airport Station, Water Shuttle dock, and terminals.</p> <p>Provided a dedicated DART bus dock at South Station with direct service to the airport.</p> <p>Implemented Logan Direct service from the South Shore.</p> <p>Continued marketing and advertising of HOV services through use of 1-800-23LOGAN telephone service and other media.</p> <p>Continued implementation of commercial vehicle lane, Neptune Road exit ramp peak period forced turnaround, local street closures, and traffic volume restrictions at Maverick Street. Continued traffic monitoring, curbside monitoring, and traffic control improvements.</p> <p>Continued development effort for Advanced Traveler Information Systems and Automatic Vehicle Identification (AVI) to monitor commercial vehicle activity.</p> <p>Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan.</p>



CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
THOMAS M. MENINO

LETTER 37

April 22, 1999

The Hon. Robert A. Durand
Secretary of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Secretary Durand:

Please accept this letter and accompanying attachments, which represent the City of Boston's comments on the Logan Airside Improvements Planning Project, Draft Environmental Impact Statement/Report, EOE #10458.

The City of Boston views the proposed project as a capacity enhancement plan. As the enclosed submission indicates, the expansion of Logan International Airport's capacity raises a number of serious concerns that the Massachusetts Port Authority's DEIS/R fails to address adequately.

Expanding Logan's capacity could harm Boston's environment and public health, due to: increased air pollution from additional aircraft, additional taxiway idling, as well as increased vehicles traveling to and from Logan, increased levels of noise pollution under proposed flight paths, soundproofing equipment which may reduce indoor air quality, and impacts on the quality of water in Boston Harbor. The DEIS/R fails to address these concerns adequately, if at all.

Expanding Logan's capacity will only increase traffic congestion at Logan and the routes to and from Logan. Adding another runway to this congested airport is like adding an extra lane to the Central Artery. It is not a serious long term solution to traffic problems. More traffic at Logan Airport will only mean more cars, trucks and shuttle buses on our congested highways and local roads. Traffic congestion is already nearly unbearable during peak travel times. The DEIS/R and Massport's previously submitted GEIR do not address the full landside impacts of these airside improvements, nor do they fully explore moving greater number of passengers to and from Logan via alternative modes.

The majority of Logan's users actually come from beyond Route 128. Adding another runway at Logan for more suburban traffic is a Band-Aid approach to a regional problem that requires a regional solution. Over the last decade, the Commonwealth has repeatedly rejected or ignored studies that have recommended increasing capacity elsewhere in Massachusetts, including: the

need to land bank a site for a second major airport at Fort Devens at the junction of I 495 and Route 2; the need to develop an existing Massachusetts regional airport or air base into a large regional reliever airport; the need to make better use of Massport's own Hanscom Field along Route 128; and the need to capture lost market share at regional airports in Worcester and New Bedford. The DEIS/R contains no strategy that projects diversion of traffic from Logan to any alternative airports. The City of Boston maintains that until the Commonwealth implements a serious strategy to divert traffic from Logan to alternative airports in Massachusetts, congestion at Logan will never be solved and the environmental impacts of Logan will never be relieved.

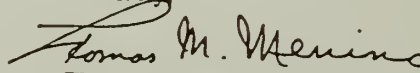
Furthermore, if the Commonwealth and the Federal Aviation Administration allow the Massachusetts Port Authority to diminish Boston's quality of life with increased air and noise pollution and weaken Boston's competitive advantage with increased traffic congestion, then economic growth in the region will occur unevenly, and the regional imbalances that have caused this problem will only grow worse over time.

As the Mayor who convened and staffed a regionalization commission to promote greater cooperation among governmental entities in greater Boston, I am proud of my consistent efforts to advance regional agendas. Many leaders in government and business recognize the need for regional cooperation, yet so few act. I trust that you will not deny greater Boston the opportunity to come together around an issue that affects so many people in so many places in so many ways. This issue is so comprehensive and complex that it begs to be examined, debated and decided in public forums on a regional level.

Finally, as the attached submission indicates, the City of Boston has a number of concerns on Massport's other plans to optimize Logan. These concerns are not adequately addressed in the DEIS/R. Missing from these plans altogether is an exploration of demand management strategies that could reduce flight delays, namely peak period pricing. As a relief strategy, peak period pricing could be implemented in far less time at far less cost to the taxpayers than a new runway.

Upon thorough review and evaluation of the DEIS/R, and for all of the reasons enumerated in the attached submission, I regret to inform you that the City of Boston finds the DEIS/R so deficient in so many respects that 1) the Massachusetts Port Authority must withdraw this document, and 2) the Commonwealth must convene a regional panel to evaluate the state of transportation in the region, develop comprehensive strategies to meet both short-term and long-term regional transportation needs, promote a greater variety of transportation options available for our citizens and our economy, and commit the Commonwealth to meet these goals in specific and feasible ways.

Sincerely,



Thomas M. Menino
Mayor of Boston

enclosures



Environmental Services
CITY OF BOSTON

THOMAS M. MENINO
Mayor

ANDREA d'AMATO
Chief of Environmental Services

EXECUTIVE SUMMARY
Logan Airside Improvements Planning Project
April 22, 1999

The City of Boston finds the Draft Environmental Statement/Report deficient and inadequate and respectfully requests that Secretary Durand of the Executive Office of Environmental Affairs and John Silva, Senior Project Manager of the Federal Aviation Administration reject the document. The document as presented does not adequately assess the environmental impacts of the proposed project or existing conditions. Further, it does not provide critical data about a surrounding regional transportation systems that can alleviate the volumes of traffic and impacts on the communities affected by Logan. The City has requested that Massport withdraw the document and that a regional planning and evaluation team be convened to assess the overall state of transportation, by all modes, airside and landside in the region. After this updated analysis is undertaken, both a short and long term transportation plan must be included in a comprehensive regional plan.

The following is a summary of issues not adequately analyzed and critical information not provided about the levels of impact:

Environment

- Air Quality

Increase levels of VOC, CO and NOx emissions are projected as a result of anticipated growth at Logan.

37.2

Increase in auto and bus emissions will result from growth.

37.3

With the addition of the Centerfield Taxiway, there will be additional planes with idling engines adding to pollutant emissions near public beaches and residences.

37.4

Current Massport soot monitoring protocols are not sufficient to determine the effect on air quality.

37.5

Current complaints about air quality, odor and soot emissions by affected residents continue and indicate current levels are not acceptable and have not been addressed. 37.6

- Noise

There will be additional noise from idling engines on the Centerfield Taxiway which will immediately impact residents of East Boston and Winthrop. 37.7

Current complaints by residents indicate that existing noise levels are not acceptable. 37.8

Massport has indicated that runway 14/32 is to be used primarily during periods of northwest winds and inclement weather. This will increase noise volumes in the flight path. 37.9

Lowering landing minimums on Runway 27 will increase noise for residents of Winthrop. Lowering landing minimums on Runways 22L and 15R will increase noise for residents of East Boston and Revere. 37.10

- Water Quality

Massport has not provided the Boston Conservation Commission with adequate information about its monitoring or its compliance with the Orders of Conditions to protect the harbor and the valuable remaining wetlands. 37.11

Massport is not in compliance with the National Pollution Discharge and Elimination Systems permitted outfalls at Logan. 37.12

No pollution treatment structures for the North, Porter and Maverick Outfalls, which serve 306 acres, are discussed as required. 37.13

Before its removal, alternatives to the Blast Fence that provides marginal protection from noise, fumes and blast effects from take-offs for residents must be identified and funded. 37.14

- Public Health

To date little or no analysis or study of the affects on public health from Logan operations has been conducted. 37.15

No analysis of federal Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. 37.16

Transportation

- **Landside Impacts of Runway 14/32**

The DEIR/S does not address the link between air transportation supply and ground transportation demand. 37.17

The DEIR/S assumes that passenger traffic at Logan Airport will grow irrespective of airport capacity and resulting delay. 37.18

The DEIR/S does not present a reasoned Build vs. No-Build analysis of airport capacity with and without Runway 14/32, nor the resulting impacts on ground transportation (regional highways, local streets, transit modes). 37.19

- **Travel Demand Management**

The DEIR/S does not adequately justify some of its future projections of transit and HOV mode share. 37.20

The DEIR/S does not differentiate the various types of HOV travel, nor does it take into account the full impacts of certain types of travel that are considered HOV (e.g. taxi and drop-off trips, passengers who drive alone to park in Chelsea are considered HOV trips because they take a shuttle one mile to Logan). 37.21

The DEIR/S does not provide adequate information on Logan Transportation Management Association membership, participation, or plans for increasing participation. 37.22

The DEIR/S does not provide adequate proposals for improving utilization of the MBTA Blue Line by air passengers. 37.23

- **Airside Transportation Impacts**

The DEIR/S does not adequately justify construction of the Centerfield Taxiway. Adequate runway crossing opportunities and airplane queuing capacity currently exist, and the construction of the Centerfield Taxiway would result excessive aircraft idling. 37.24

Runway 14/32 would address weather-related delays, but these are only a portion of the airside delays. The DEIR/S does not provide information on the relative impact of different causes of delay: weather, mechanical, and delays originating from other airports. 37.25

The DEIR/S discounts peak period pricing because it is assumed to reduce regional air service. Massport should analyze a peak period pricing scenario, which considers a shifting of some service to other regional airports. 37.26

Regional Alternative

- There is no description of a regional plan that actually diverts traffic from Logan. 37.27
- There are no funding requests in the Transportation Bond Bill for upgrades at Worcester, Hanscom, or Fort Devens to improve infrastructure and public transit as part of a regional strategy. 37.28
- Peak pricing is not explored as a tool to divert flights in the region. 37.29

ATTACHMENTS

- Letter from Mayor Thomas M. Menino to Massachusetts Secretary of Environmental Affairs Robert A. Durand, April 22, 1999
- Letter from Mayor Thomas M. Menino to Federal Aviation Administration Environmental Programs Manager John C. Silva, April 23, 1999
- Letter from Mayor Thomas M. Menino to the Hon. Robert A. Havern, III, Chairman, and the Hon. Joseph C. Sullivan Joint Committee on Transportation, State House, March 26, 1999
- Mayor Thomas M. Menino's testimony at the State House, March, 23, 1999
- Letter from Mayor Thomas M. Menino to Hon. Robert Durand, Secretary, EOEa, April 7, 1999
- Letter from John Auerbach, Executive Director of the Boston Public Health Commission to Andrea d'Amato, Chief of Environmental Services, City Of Boston April 20, 1999
- Detailed comments of the Boston Redevelopment Authority to Secretary Robert Durand, EOEa and John C. Silva, FAA April 23, 1999
- City of Boston Environment Department Response to 1997 Annual Update to Secretary Trudy Coxe, EOEa, October 13, 1998
- City of Boston Environment Department Response to 1997 Annual Update to Secretary Trudy Coxe, EOEa, November 24, 1997
- City of Boston Environment Department Response to 1997 Annual Update to Secretary Trudy Coxe, EOEa , September 24, 1996
- Agreement between the City of Boston, Massport and the FAA regarding Minimum Approach Altitudes for Runway 15R, August 8, 1980





Environmental Services
CITY OF BOSTON

THOMAS M. MENINO
Mayor

ANDREA d'AMATO
Chief of Environmental Services

April 23, 1999

Honorable Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attention: Arthur Pugsley, MEPA Unit

John Silva, Environmental Programs Manager, Airports Division
Federal Aviation Administration New England Region
12 New England Executive Park
Burlington, MA 01083

Re: Logan Airside Improvements Planning Project, Draft Environmental Impact Statement/Report, EOE
#10458

Dear Secretary Durand and Mr. Silva:

The City of Boston has reviewed the Draft Environmental Impact Statement/Report (DEIS/R) for the above referenced project and hereby submits the following comments. The City of Boston's Environment Department, the Boston Transportation Department (BTD) and the Boston Public Health Commission (BPHC) have reviewed the DEIS/R and the City offers the following response to the DEIS/R. Attached and incorporated herein are detailed comment letters from the Boston Public Health Commission and the Boston Redevelopment Authority (BRA).

The City of Boston views the proposed project as a capacity enhancement plan. The capacity issue at Logan International Airport (Logan) is only one part of a New England transportation system that must be addressed on a regional, inter- and multi-modal level.

37.30

The City of Boston finds the DEIS/R deficient in many respects and respectfully requests that:

1. Massport withdraw this document;
2. A regional panel of experts be convened to immediately assess the overall state of transportation in the region;
3. This panel develop strategies for both short- and long-term regional transportation needs and identify a variety of transportation options available for the traveling public and the movement of goods; and,

37.31

4. Communities in the region be fairly and adequately represented on such a panel along with public officials, economists, land use planners, and representatives of environmental and public health interests.

ENVIRONMENTAL CONSEQUENCES

Air Quality

Massport's 1996 Generic Environmental Impact Report (GEIR) indicates that while emissions of VOC and CO have decreased (as has NOx to a much lesser extent), these emissions are expected to increase in the future. This is a critical issues with Stage 3 aircraft emitting significant amounts of NOx and with the projected increase in aircraft operations over time. Massport is to be commended for its program to convert its ground service vehicle fleet to alternative-fueled vehicles. Similar efforts by tenants must be strongly promoted by Massport. The City has suggested in prior comments on Massport MEPA filings that important steps in mitigating the air quality impacts of Logan may include lease agreements with new or renewing tenants that contain requirements or incentives, such as reduced curb fees for private fleet operators, for use of low or no emission vehicles by tenants.* In addition, the City believes that additional measures are necessary and requests that Massport and a regional transportation task force investigate other available technologies, particularly from companies based in the region, for reducing air emissions. 37.32 37.33 37.34

For several years, Massport has indicated that it is evaluating the benefits of moving bus servicing and other operations to off-airport locations. This will add vehicle trips to current levels, a detriment to air quality. The City has twice requested that a detailed analysis and discussion be presented in a GEIR or Annual Update (AU) but Massport has never responded to this inquiry. 37.35

Massport has stated in prior environmental review documents that PM_{2.5} data for aircraft are not currently available. This is surprising since aircraft engines have undergone emissions testing for many years. This should be a subject evaluated in scientific and technical detail by the regional panel of experts. Findings and recommendations on this issue should be a component of a regional transportation report. 37.36

*References to "previous comments" refer to written comment letters submitted to MEPA and other government entities regarding Massport GEIRs, Annual Updates and project-related environmental filings.

Massport cites in the DEIS/R two soot studies released in 1997 showing that deposition of particulates in surrounding neighborhoods was not the result of aircraft operations. At that time, the Boston Air Pollution Control Commission (APCC) raised several questions as to the reliability of those studies. In particular, the APCC questioned the use of "wipe" samples from jet engine housings as representative of actual particles generated by engine operation during take-off. It is reasonable to question whether the soot adhering to the engine cowling of a single Boeing 737 might not be physically and chemically different than a particle ejected from the engine during take-off. During take-off, when the engine is running at higher RPMs, the combustion process may produce different size particles with different hydrocarbon make-up than the particles that have condensed on or adhered to the side of the engine (presumably during taxiing or idling at the gate) and exposed to prolonged periods of high temperature.

Given the continued reporting of anecdotal evidence of soot deposition and the open issues as to the accuracy and robustness of the soot monitoring protocol, the City of Boston respectfully submits that this matter demands further study. Coupled with the continuing problem of odor from aircraft operations, the overall emissions from all airside operations should be the subject of a truly comprehensive, state-of-the-art monitoring and modeling study. Critical components of this study should include:

1. Compilation of a database on emission factors for aircraft engines typically found at Logan;
 2. Detailed modeling for NO_x, PM₁₀, PM_{2.5}, and VOCs based on emissions factors and number of operations/elapsed time of operations for each type of engine. The model should include both worst-case and averages based on meteorological data for the past 5 years; and,
 3. A particulate deposition study using data from actual jet engine test cell sampling to provide more accurate particle speciation of soot collected from the surrounding neighborhoods.
- The methodology for this study should be subject to public and peer review prior to implementation.

The proposed Runway 14/32, at a minimum, facilitates more aircraft operations per hour during certain weather conditions. This is especially of concern when 14/32 is used for departures (wind out of the southeast) and emissions from take-off are blown back into the neighborhood. The result is that the Jeffries Point neighborhood and surrounding areas may experience an increase in concentration of jet emissions during southeast wind conditions. Moreover, 14/32 is part of Logan Airport's overall program to increase passengers levels to a minimum of 37.5 million in 2010 and, as such, contributes to the increase in emissions generated by the new aircraft operations. For these reasons alone, the Secretary should find the air quality analysis in this DEIS/R inadequate and order a re-filing of a DEIS/R including a full air quality analysis based on data from the studies outlined above.

Noise

The City respectfully disagrees with the statement in the DEIS/R that the Centerfield Taxiway will reduce noise impacts from taxiing aircraft in the areas located north/northeast of the airport.

In our analysis, the Centerfield Taxiway will allow an increased number of aircraft to queue on the airport's taxiways with their engines running. A close inspection of Massport's Airport Layout Plan (ALP) clearly notes that the Bayswater Street neighborhood of East Boston is only about 1,500 feet from Taxiway November as it runs from Runways 22L and 22R. Residents living in the Orient Logan

Heights section of East Boston between the Winthrop and Scarpa Bridges experience daily the consequences of lengthy aircraft idling. This is especially notable during the warm summer weather when 22L and 22R are used simultaneously for large aircraft operations.

It is during the summer season that air and noise impacts are most severe for East Boston residents. The existing aggregation of departures and arrivals on 22R/L and taxi events on November Taxiway cause a great deal of discomfort for those who live in Orient Heights. The Centerfield Taxiway will increase these numbers, adversely impacting residents and beach users. The low frequency noise associated with departures and high frequency noise associated with arrivals and taxiing aircraft also substantially increase the irritation experienced by residents and beach-goers.

Other Boston neighborhoods will also experience elevated noise levels as a result of the proposed plan. The projected increase in take-offs from Runway 27 will affect, at a minimum, the Seaport, South Boston, the South End, Roxbury, the Fenway, Jamaica Plain, Roslindale, Mattapan, West Roxbury and Hyde Park. Charlestown will also experience substantial increases in aircraft-related noise.

Blast Fence

The Blast Fence at the Runway 22R/22L end of Logan, directly across from the Orient Heights Yacht Club and Bayswater Street, is briefly mentioned in the DEIS/R. The issue of this fence and the absence of related community process is another example of how the needs of East Boston residents are devalued. Further, it serves as an illustration of the conflicting interests faced by airport and federal decision-makers as demand at Logan increases.

East Boston residents view the blast fence as a device that partially mitigates fumes, noise and blast effects from takeoffs on Runway 22R. Massport believes that it has an obligation to take the fence down because it is frangible, and would therefore present a hazard to flight personnel and air passengers in the event of a crash. Although residents are equally concerned with airline safety, the community feels strongly that the removal of the fence will negatively affect yacht club members, recreational users of Constitution Beach and those who live in Orient Heights. The safety of air passengers, flight and ground personnel should not be accomplished at the expense of members of the public. Noise, fumes and the jet blast may present a hazard to residents, boaters and other uses of the beach. An alternatives analysis, prior to the filing of environmental documents, should include the results of a detailed investigation of a non-frangible barrier and other methods to ensure that the quality of life in and adjacent to Orient Heights is not further degraded.

Reduced Approach Minimums for Runways 15R, 22L and 27

The City does not agree with the FAA's assertion that lowering landing minimums will result in noise benefits for residents under the approach path to the runways in question. As the City understands the policy used by air traffic controllers in the Boston Tower when a pilot performs a missed approach because he/she cannot see the runway, the FAA will close that particular runway and choose a secondary runway or, in a serious weather situation, close the airport until there is an improvement. Lowering the landing minimums is likely to result in the use of these runways more often during poor weather conditions exposing nearby residents to noise levels which they currently do not experience.

The City of Boston believes that lowering the landing minimums will only serve to expose already overburdened residents to additional noise impacts. Aircraft operations during inclement weather tend to expose nearby residents to higher noise levels than under normal operating conditions. The reasons for this are twofold. First, during severe weather conditions involving heavy winds and rain, a pilot must apply a greater level of thrust and adjust the aircraft's flap setting to maintain stable flight. This results in higher noise levels

and increased impacts for residents under the flight path. Second, a low cloud cover is usually present under the weather conditions that dictate the use of these lower landing minimums. When this situation occurs, noise levels from aircraft events are amplified in intensity and tend to last longer than on a clear day.

The DEIS/R indicates that the reduction of approach minimums is consistent with the minimums in effect at other major commercial airports. Current industry practice for major commercial airports allows for greater use of the four runways under certain weather conditions. However, Logan is not a typical airport. It is located in a densely populated residential area, near scarce open spaces and other sensitive receptors. This makes noise a very real problem, one that will be exacerbated by the increased thrust necessary to abort a landing at lower minimums. The City questions if the referenced "major commercial airports" are located in similar areas. When other major commercial airports are referenced in environmental review documents, the locations and characteristics of these airports should be detailed.

37.43

The approach to Runway 15R positions arriving aircraft over the heavily populated Eagle Hill section of East Boston while the approach pattern to Runway 22L results in overflights in the Orient Heights neighborhood. Lowering the landing minimums on Runways 22L and 15R will increase the noise impacts on East Boston residents. As noted in the DEIS/R (Volume I, p. 3-36), the City of Boston entered into an agreement with the FAA and Massport not to decrease the landing minimums on Runway 15R. It is our intention that this agreement should be respected and honored. The City's concerns are based on the premise that an arrival is the most difficult and challenging portion of a flight and that the poor weather conditions that usually trigger the use of these lower landing minimums only serve to heighten the workload for pilots during this segment of a flight. With the high number of residents living alarmingly close to the touchdown point of these two runways, the lowering of the landing minimums will place these residents in additional peril.

37.44

Water Quality

Logan was constructed in wetlands at a time when the value of wetlands was neither recognized nor acknowledged. Over the years, the airport has expanded further into the wetlands and coastal resources of the City. Issues such as the regional economy and transportation have overshadowed the protection of the remaining wetlands. Although Massport has committed to protecting the bordering resource areas and complying with permit conditions, contaminants continue to enter Boston Harbor.

37.45

There are four Environmental Protection Agency (EPA) National Pollution Discharge and Elimination System (NPDES) permitted outfalls at Logan Airport: North, West, Porter and Maverick. According to the 1997 GEIR Annual Update (AU), only the North and West outfalls are equipped with advanced oil/water separator treatment systems. As described in the AU, the North Outfall "improved its compliance record for oil and grease, was in full compliance for pH, and compliance for settleable solids was slightly lower than in previous years." The West Outfall "achieved near-full compliance for oil and grease, and 100 percent compliance for pH levels and settleable solids." The Porter Street Outfall was in "complete compliance" with the NPDES permit requirements for oil and grease and pH. The Maverick Street Outfall achieved "full compliance" for oil and grease and "near-full compliance" for pH. The City finds this reporting imprecise and misleading and it is apparent that discharges are not meeting the EPA's NPDES limits.

Massport's DEIS/R description of its present drainage system describes four NPDES outfalls that drain terminal areas and portions of the airfield, approximately 50 perimeter outfalls and reliance on infiltration over pervious grasslands for the main airfield. The West Outfall, with a 557 acre drainage area, employs pollution control devices, including a mechanically cleaned bar screen, oil skimmer, grinder pump, sedimentation tank and an oil/water separator. The DEIS/EIR does not identify any pollution treatment structures for the North,

37.46

Porter and Maverick Outfalls that, combined, serve a 306 acre drainage area. It is also unknown if the 50 perimeter outfalls treat pollutants and if they are monitored and maintained.

Since 1989, the Boston Conservation Commission (BCC) has issued to Massport eleven Orders of Conditions requiring protection of bordering wetland resources. These special conditions issued by the BCC relate not only to the construction periods of projects but to the perpetual operation and maintenance of new structures.

In 1994, 9,000 square feet of wetlands (salt marsh) were lost due to construction of an FAA-mandated safety ramp at the end of Runway 22L. The U.S. Army Corps of Engineers (USACOE), the Commonwealth of Massachusetts Department of Environmental Protection (DEP) and the BCC required that Massport replicate 56,250 square feet of salt marsh on the grounds of Logan Airport in the Wood Island Marsh area of Boston Harbor. The fifth and final annual monitoring report issued for the salt marsh in 1998 states that the vegetative cover across the created marsh is at the 70% level. *The full value of the lost wetlands is hard to establish and there are serious questions as to whether created wetlands truly replicate the full functions of a natural wetland.*

While Massport identifies its existing drainage structures, there is no information describing drainage plans for 14/32 runoff. Pervious vegetated areas and infiltration are mentioned numerous times as beneficial to reducing water quality impacts and include a statement that "the combination of overland runoff and a large number of small discharge locations tends to attenuate and disperse the de-icing compounds used on the airfield" (DEIS/R Volume I, p. 6-94). The proposed airside improvements will result in the conversion of 39.4 acres of vegetation to paved surface. Massport anticipates the need to use more de-icing agent with the proposed improvements. If overland dispersion is presently a method of treating these compounds, how will the loss of 39.4 acres be addressed? . How will Massport mitigate this loss of pervious area?

It is obvious when one reviews Logan AUs that Massport is experiencing difficulty in complying with the BCC Orders of Conditions and EPA NPDES permits conditions. Although the AUs note that some improvements are being made, the BCC will find it difficult to permit the creation of additional impervious surface and the construction of additional facilities that may impact Boston Harbor and bordering wetland resources. The City concludes that Logan has reached its maximum development level or may have surpassed its capacity for this parcel, bordered by fragile natural resources.

Billions of taxpayer dollars are being spent to clean and maintain Boston Harbor. Federal, State, and local environmental agencies permit and regulate facilities that discharge into the Boston Harbor Watershed. New permits or amended permits for increased size or capacity of facilities that discharge are conditional upon compliance with existing uses. The City asks that Massport review its permits, including all perpetual Orders of Conditions, and provide evidence that these conditions are being met.

Furthermore, the City asks that Massport provide documentation that these commitments are being met:

DEP File No. 6-464, March 13, 1991

Logan Landscaping Improvements Special Conditions

14. Where relevant, all facilities and equipment will be continually operated and maintained so as to comply with the conditions and the Act. Maintenance conditions are ongoing and do not expire at the end of one year or with the issuance of the Certificate of Compliance. The applicant, owner successor or assignees shall be responsible for maintaining all on-site drainage structures and outfalls, assuring the lasting integrity of the surface cover on the site

and site activities so as to prevent erosion, siltation, sedimentation, chemical contamination or other detrimental impact to the on-site and/or off-site resources areas.

19. All surface drains on the project site must have a legible stencil painting within one foot of the structure indicating that the drain drains to the Boston Harbor.

DEP File No. 6-467, June 19, 1991

Massport Employee Parking and Associated Roadway Special Conditions

16. Where relevant, all facilities and equipment will be continually operated and maintained so as to comply with the conditions and the Act. Maintenance conditions are ongoing and do not expire at the end of one year or with the issuance of the Certificate of Compliance. The applicant, owner successor or assignees shall be responsible for maintaining all on-site drainage structures and outfalls, assuring the lasting integrity of the surface cover on the site and site activities so as to prevent erosion, siltation, sedimentation, chemical contamination or other detrimental impact to the on-site and/or off-site resources areas
18. Signage on the site shall indicate that the drainage drains to the Boston Harbor.
20. All catch basins and other drainage structures shall be cleaned and maintained regularly. A plan and schedule shall be submitted to the Boston Conservation Commission prior to the issuance of a certificate of Compliance. This maintenance condition shall continue in perpetuity.

37.50

DEP File No. 6-516, July 22, 1992

Massport Test Borings/Logan

16. During and after work on this project, there shall be no discharge or spillage of fuel, oil or other pollutant into any area of statutory interest. The proponent shall have an emergency spill management plan prior to work start up, a copy shall be sent to the Conservation Commission.

37.51

DEP File No. 6-544, May 12, 1993

Logan Safety Ends

14. Where relevant, all facilities and equipment will be continually operated and maintained so as to comply with the conditions and the Act. Maintenance conditions are ongoing and do not expire at the end of one year or with the issuance of the Certificate of Compliance. The applicant, owner successor or assignees shall be responsible for maintaining all on-site drainage structures and outfalls, assuring the lasting integrity of the surface cover on the site and site activities so as to prevent erosion, siltation, sedimentation, chemical contamination or other detrimental impact to the on-site and/or off-site resources areas
34. All newly constructed or relocated catch basins for runoff from the perimeter access road or other paved surfaces shall include oil/water separators to meet the needs of appropriate control of the paved drainage area. Enclosed are BWCS oil/water separator standards.

37.52

Wildlife Habitat

Massport minimizes the importance of wildlife habitat areas at Logan Airport claiming that the urban environment hampers the establishment and/or viability of any natural habitat. The City accepts that the wildlife, a variety of birds and mammals, take second place to the functioning of the airport. At the same time, the Boston Conservation Commission serves to protect and enhance the City's natural resources. The established habitat, including the presence of the upland sandpiper (a state-listed endangered species) is proof

that there is a viable habitat at the airport and that Logan is not and cannot be segregated from the Boston Harbor and Belle Isle Marsh ecosystems. 37.53

The DEIS/R Conservation and Management Plan has three sections:

- alteration of existing airfield grassland mowing procedures to encourage the uses of non-construction areas;
- implementation of a pre-construction and an on-going pre-mowing upland sandpiper reconnaissance program; and,
- off-site mitigation.

The City strongly objects to the suggestion that off-site mitigation should occur outside of the Boston Harbor area.

Public Health

The Boston Public Health Commission (BPHC), believes that Massport, the FAA and the U. S. Department of Transportation (DOT) have failed to take the health of Boston residents into consideration in planning the proposed project. This is of particular concern because of the potential impact on some of the City's most vulnerable populations, disproportionately affected by negative environmental factors. In addition, the failure to consider such matters appears to be out of compliance with federal Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." This Order requires every federal agency to identify and address the environmental and health effects of its programs that particularly burden minority and low-income communities. The City asks that the FAA and DOT comply with this Order and provide documentation and all relevant data to that effect. Additional detail is provided in the attached letter from the BPHC. 37.54 37.55

The City notes that Massport was a contributor to a South Boston air quality study conducted by the Harvard School of Public Health on behalf of the South Boston Community Health Center. The study gathered important information on various sources of air contaminants including apportioning sources of PM₁₀ and PM_{2.5}. There would be considerable value in gathering such information and monitoring particulate matter levels in other Boston neighborhoods impacted by Logan. This information will allow public health officials to build on the information gathered thus far.

TRANSPORTATION

Ground Transportation

Massport has consistently framed projects based upon a premise that landside and airside issues are independent of each other. The City of Boston has long maintained that the two are inextricably linked. 37.56

The City of Boston requests that the Secretary find this DEIS/R inadequate on the grounds that there is no analysis of the landside transportation impacts of the proposed Runway 14/32. The DEIS/R's reliance on analysis included in the GEIR is unacceptable, since the GEIR does not include specific impacts related to Runway 14/32. In addition, the City finds that many of the GEIR's assumptions related to HOV and transit modes are questionable, and that these assumptions should be re-examined.

The DEIS/R's neglect of landside transportation issues is based on the premise that Runway 14/32 will not add capacity, only relieve delay. The City strongly questions the premise that passenger demand at Logan Airport is inelastic with respect to delay. The DEIS/R states that passenger demand will grow from approximately 25 million per year to 37.5 to 45 million per year, irrespective of the levels of delay, whether or not Runway 14/32 is built. Under this assumption, the only impact is on delay, which more than quadruples from an estimated 37.57

143,000 hours in 1998 to 596,000 hours in 2010 with no new runway. It is illogical to suggest that such an increase in delay would not result in a shift in air service to New England's other airports or other services to substitute for air travel to and from Logan Airport. Such a shift in activity would result in divergent Build and No-Build conditions.

This demands that Massport analyze the difference between the Build and No-Build conditions, for both airside and landside impacts. Massport should be required to examine runway operational capacity, landside trips by mode, impact on roadway and transit capacity, and unfulfilled passenger and cargo demand that could be accommodated at other regional airports and transportation facilities.

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Further, the GEIR's traffic analysis sections have consistently been fraught with unsupported assumptions and questionable methodologies. For instance, in calculating high-occupancy vehicle trips (HOVs), Massport includes employees who come in by shuttle bus from the 1,550-car parking garage in Chelsea and from parking facilities in Revere. Most employees have driven in single occupant vehicles (SOVs) to these facilities and ride in an HOV for about one mile to the airport. It is specious to suggest that a one mile ride in a shuttle van or bus from a parking lot to the airport constitutes HOV commuting. Such a perspective could conceivably allow for reports of increased employee HOV use while the 7,100 on-airport employee spaces and a substantial increase in employee parking in areas surrounding the airport would allow for ample, unconstrained SOV commuting.

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According to the 1997 GEIR Annual Update, 1997 scheduled and non-scheduled air passenger HOV ridership increased by 6.8% and 7.0% respectively over 1996 levels. While the City is pleased to see HOV increases, the question remains how single party transportation by an unscheduled commercial provider is considered an HOV service. A means of transit should not be considered high occupancy unless there are three or more air passengers in the vehicle for the majority of the trip. A private, on-demand service that transports one passenger to Logan is not an HOV, but functions as does a taxi.

Again, future air passenger surveys, information asked of registered providers and Transportation Services Unit statistics should distinguish between the use of vehicles containing less than three air passengers and those containing three or more air passengers (true HOVs). Current and projected mode share statistics should then be modified as necessary to reflect the difference. A distinction must also be made between carpoolers and drop-off/pick-ups. The Boston Transportation Department (BTD) suggests that Massport re-think traffic impact analysis in terms of vehicle-miles traveled and passengers per vehicle trip.

Massport appears to rely on additional passenger and employee parking facilities just outside the East Boston parking freeze area to get employees and passengers within shuttle range of the airport. This puts an increased burden on private sector carriers and nearby communities to accommodate potentially dramatic increases in vehicle trips. This would certainly seem to work against the goals of the Transportation Management Association (TMA).

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The 1997 Annual Update indicates that TMA membership is now 20% of all airport employees and that one TMA member is offering subsidized MBTA passes. No information is provided about the number of employees who belong to the TMA or who receive an MBTA pass subsidy. No explanation is offered for the TMA estimate that a reduction of only 250 to 300 employee commuter vehicle trips may result from Transportation Demand Management (TDM) measures. With 15,000 individuals employed at Logan, this trip reduction estimate is particularly questionable.

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Completion of the MBTA's Blue Line Modernization Program is described as a project that, in conjunction with the Airport Intermodal Transit Connector (AITC) and other transit projects will help increase the number of airport passengers using transit. Although the MBTA has not announced a final project schedule for the Blue Line project, it has been progressing at a slower than anticipated pace. This situation must be taken into account in assessing the impacts of increased operations and passenger levels. 37.62

Centerfield Taxiway

The DEIS/R claims the Centerfield Taxiway will reduce taxi delay for 4R arrivals trying to cross 4L at the 33R/4L intersection, permitting simultaneous crossings of 4L at multiple points and moving activity away from communities. There are currently three (3) access points available to cross Runway 4L for arrival traffic on Runway 4R enroute to the terminal area:

- the high speed turn-off Taxiway R to Taxiway N;
 - the high speed turn-off Taxiway Y to Runway 4R; and,
 - for smaller jets and commuter aircraft, Runway 33L to Taxiway Q.
- 37.63

It is not clear why three (3) crossing points to Runway 4L are insufficient to handle most, if not all, capacity situations. Based on Massport's assertion that three crossing points are in adequate, specific information is lacking to substantiate the claim, such as:

- the number of crossing points for Runway 22R/4L that Massport believes and the FAA requires to reduce taxiing delays for Runway 4R arrivals;
- a description of scenarios under which there would be more than three (3) aircraft on various taxiways waiting to cross Runway 4L with Runway 4R in use for arrivals; and,
- a description of the delay benefits to an aircraft landing on Runway 4R, and holding short of Runway 4L under current conditions, in comparison to an aircraft landing on 4R and using the Centerfield Taxiway to seek an additional point to cross 4L.

The Runway 4R scenario fails to justify the benefits of the Centerfield Taxiway. The City disagrees on the issue of simultaneous crossings of Runway 4L at multiple points. Additionally, Massport's claim that the Centerfield Taxiway will move this type of activity away from the community lacks merit. While it may move aircraft taxiing to the terminal area further from the Harborview section of East Boston, it would move taxiing aircraft closer to both the Bayswater section of East Boston and the town of Winthrop. Even if the Centerfield Taxiway is constructed, a pilot must still hold short of Runway 4L prior to crossing, regardless of the point of approach, until he or she receives FAA ground control clearance.

While the Centerfield Taxiway would provide an additional taxiing route to both Runways 22L and 22R, the City believes that the delay benefits may be exaggerated. The issue of Runway 22L departures is overstated as demand for departures on this runway is minimal. Further, the City questions the delay benefits of a Centerfield Taxiway. During peak periods, the current number of aircraft on Taxiway November, approximately 3,800 feet in length, enroute to Runways 22R/L for departure, usually totals 10 to fifteen. The Centerfield Taxiway will be 9,300 feet in length. Since both the FAA and Massport will not agree to limit the number of aircraft allowed to queue on the Centerfield Taxiway, this will result in the potential for FAA ground controllers to approve permission for 40 to 50 aircraft to taxi to either Runway 22R or 22L. The City finds it difficult to comprehend how any aircraft located in the rear of this enormous queue would depart any earlier than if the pilot 37.64

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was waiting at a gate with the plane's engines off. *Delays would remain*, with the only difference being in the location of the aircraft at the airport. Furthermore, additional information and clarification are necessary on the environmental benefits, both from a noise and air quality perspective. It is difficult to comprehend how environmental improvement can occur when there will be a dramatic increase in the number of aircraft on the airfield with engines running. The great majority of these aircraft will operate much closer than they do now to both the Bayswater Street and Court Road neighborhoods.

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The City of Boston believes that possible delays on Echo Taxiway from arrivals on Runway 22L also fail to justify the construction of the Centerfield Taxiway. Massport claims the Centerfield Taxiway would allow simultaneous crossings of Runway 22R at multiple points. This issue must be clarified as the City understands that multiple crossings of 22R currently exist at Taxiways Echo, Charlie and Sierra for large jet aircraft and Taxiways Echo, Charlie, Sierra, Fox Trot and Quebec (via Runway 33L) for smaller aircraft. How many crossing points are required in order for the air traffic controller to have a safe and efficient set of options? Also, what are the environmental benefits related to the Centerfield Taxiway if a pilot enters the Centerfield Taxiway and heads back towards the community seeking a place to cross Runway 22R?

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Although there may be times when an aircraft taxiing on the Inner Taxiway (Alpha) is required to hold short for an aircraft push-back, this event should only occur at Terminal C, Gates 29, 30, 32 and 34. Any delays that occur in this small area are infrequent and do not necessitate the construction of a 9,300 foot taxiway. Also, Massport has listed as one of its criteria for the construction of the Centerfield Taxiway the concern about wing-tip clearance conflicts on Taxiways Alpha (Inner) and Kilo (Outer). Should the Inner Taxiway remain in service subsequent to the construction of the Centerfield Taxiway, what is to prevent this potential conflict from remaining a concern?

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Massport claims the Centerfield Taxiway will enhance the general safety of airside operations and facilitate more efficient movement of aircraft between terminal areas and runways during takeoff and landing procedures. While it may facilitate aircraft movements on the airport surface, the City questions how it would enhance the general safety of airside operations, since the dramatic increase in the number of simultaneous aircraft ground movements could increase the potential for ground incursions on Logan's complex taxiway system.

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The location of the Centerfield Taxiway will be between Runways 22R and 22L, separated from the runways by 1,500 feet. Taking into consideration its length (9,300 feet) and the proposed location, a pilot not familiar with the airport may experience an identification problem while on approach to either 22L or, for small aircraft, 22R. Although surface lighting differentiates taxiways and runways, there exists the potential for a pilot to land his or her aircraft on the wrong runway or on the taxiway itself. While this may not be a daily difficulty, it has transpired at Logan without the existence of the taxiway between the runways. As evidence is the event that occurred on July 12, 1987, when a jet transport landed on Runway 22R rather than 22L as assigned.

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The November Taxiway will remain in operation. Therefore, the City would like to request clarification on how the air quality and noise benefits will be achieved? In our opinion, it appears that

November Taxiway will continue to impact the East Boston Yacht Club, Constitution Beach and the western portion of Bayswater Street, while the Centerfield Taxiway will place taxiing aircraft closer the Court Road section of Winthrop and to the center of the Orient Heights / Bayswater Street Neighborhood.

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The DEIS/R also claims that the Centerfield Taxiway will reduce delays for aircraft enroute to Runways 22R/L for departure. Although this could occur if a minimal number of aircraft on the field, the City questions how this benefit would be accomplished during peak periods of operation, when the number of aircraft movements on the airfield increases substantially? Construction of the Centerfield Taxiway could literally allow more than double the number of aircraft ground movements occurring simultaneously on Logan's taxiway and runway network, than currently possible. Although there would be two routes for aircraft enroute to Runways 22R/L for departure, all the City can deduce from this scenario is the more than doubling of the current level of delays and the associated increase related to both noise and air quality impacts.

If the motivation behind this taxiway is to open gate space by increasing queues on taxiways, allowing Massport to reduce the so-called "delays" occurring now, then this plan is clearly a capacity enhancement program for Logan.

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Delay

The City questions Massport's representations of delays. Massport asserts in the DEIS/R that delays at Logan are primarily caused by the drop in airfield capacity that results from wind and the weather conditions forcing use of a two runway configuration. However, there is no hard data provided to sustain this conclusion and the DEIS/R discussion fails to comply with the Certificate issued by the Secretary in 1995 on the ENF. Missing from any discussion or evaluation of delay is the role of other airports in delaying flights destined for Logan and problems with equipment or personnel, both at Logan and other airports. Airlines with older fleets may be particularly subject to mechanical difficulties and other delay-prone airports likely contribute to the identified problem at Logan. Delays due to cargo and small commercial and private aircraft must be a significant factor in delay. This suggests to us that delay must be evaluated in a regional context as these are the types of flights most easily accommodated at other airports.

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Future air passenger surveys should include questions about the passenger's origin and the timeliness of the flight(s) leaving the city of origin or that they traveled on prior to reaching Logan.

Peak Period Pricing

Massport's recommended project alternative does not include peak period pricing. Such a program would raise the price of using Logan during hours where the level of demand exceeds available runway capacity.

In its analysis of this administrative option, Massport assumes that some existing aircraft operations would be discontinued by a shift to off-peak hours or cancellation of the service altogether. A scenario in which airlines would move service to a regional airport is not mentioned, as if it were not a viable option. Also neglected is a plan in which airlines would continue to offer flights at peak times but

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would add a surcharge to the fare to make up for the peak assessment. In short, peak period pricing need not result in reduced regional air service. Massport's rejection of this alternative is unsupported by the arguments outlined in the DEIS/R. What is clear is that diversion of service to regional airports, not owned by Massport, will hurt Massport's bottom line.

Finally, Massport considered a revenue neutral peak period fee structure in 1992 and decided to publicly examine that option as part of an overall airside improvements plan. This represents the loss of six years in which such a program might have helped regional airports attract service.

REGIONAL ALTERNATIVES

The DEIS/R asserts that Massport's overall planning strategy for managing congestion and improving Logan's operational efficiency includes the use of regional air, rail and videoconferencing (telecommunications) alternatives. Ensuring the efficient use of the region's transportation infrastructure is described as the collaborative function of a range of transportation entities including the FAA, Massachusetts Aeronautics Commission, New England State Aviation Directors and regional airports. Participation in long-term regional planning studies is also identified as part of Massport's long-standing recognition of the importance of discussions on intermodal, regional transportation projects.

Background

The City of Boston sees the proposed Runway 14/32 as a stop-gap approach to a truly regional transportation problem. The most serious delays at Logan are caused by a lack of appealing alternative airports in greater Boston for airlines and consumers. Without attractive options, traffic to Logan will continue to increase. The City of Boston cannot absorb additional growth in capacity.

According to Massport's own documentation, the opportunities for Logan's growth are limited. Massport's Director of Aviation stated that "Ultimately, there will be a ceiling that will be hit" (Boston Globe, June 19, 1994). As far back as four years ago, Massport staff noted that "Logan can't continue to handle it anymore" (Boston Globe, November 28, 1995). An FAA-funded report further stated that "regardless of the author or methodology, everyone agrees that Logan will soon be unable to meet demand" (New England Regional Air Passenger Service Study, Executive Summary, 1995).

The DEIS/R states that the majority of Logan's users come from beyond Route 128. This indicates that growth is occurring at the metropolitan edge while Logan remains greater Boston's only major airport. As more travelers fight traffic on urban roadways to get to Logan, the people who live and work beyond Route 128 will be unable to get to Logan on time. In the final analysis, attracting more passenger traffic to Logan will only aggravate delays. According to a 1995 Boston Globe report, this fact has been recognized by Massport officials. In a December 24, 1995 article, an official stated that a new runway at Logan "won't ease the congestion that now ranks Boston as the nation's fifth worst city for flight delays. This record undoubtedly will get worse,...if Logan's passenger traffic grows as expected, from 25 million people this year to a projected 45 million in 2010." The Strategic Assessment Report (SAR), conducted in 1993 for the Massachusetts Aeronautics Commission (MAC) by Arthur D. Little, Inc., agreed: "Simply improving the capacity of Logan will not solve the transportation capacity problem" in the region (SAR, Volume 1, ES-6).

The FAA's Airports Division of the New England Region determined that decentralizing airport usage patterns is critical to meet the region's future high speed transportation needs (Issues in Developing a New England Service Plan, April 28, 1994). Massport's planners voiced the same conclusion. "Diverting travelers from Logan, they say, is about the only way that they can see to relieve growing congestion and delays in Boston"

(Boston Globe, December 24, 1995). Any further concentration of traffic at Logan Airport contradicts these policy statements.

Table 4-8 in the 1996 Annual Update (AU) to Massport's Generic Environmental Impact Report (GEIR), contained a list of Regional Planning Studies and the implications of those studies for Logan. The City found that the information Massport chose to highlight from two of the cited studies, the SAR and the Second Major Airport Siting Study (SMA), did not fully represent the conclusions of those studies as they would affect Logan. The same is true for the way in which Massport now portrays the motivations for and conclusions of these studies in public Airside Improvements presentations.

The SMA study was undertaken because the 1989 Massachusetts Airport System Plan (MASP) concluded that even with operational and capacity improvements at Logan there would be a need for a second major airport by 2010. The SMA study did not contain a specific recommendation about the type of airport necessary (international, short-haul, or long-haul domestic). The SMA study recommended that the state land bank a suitable site for a potential second major airport, most preferably at the decommissioned Ft. Devens in Ayer, near the junction of Interstate 495 and Route 2. This policy recommendation was eventually discarded by the Weld administration.

After the Weld administration decided against pursuing plans for a second major airport in the region, the Strategic Assessment Report (SAR) was conducted and rested upon baseline assumptions that were different from the 1989 MASP and 1990 SMA study. The primary differences were in demand forecasting for Logan and in the potential effects of telecommunications and new travel technologies on passenger numbers. Significant reductions in air travel demand were forecast due to projected growth in telecommunications (including videoconferencing), vertical take-off and landing (VTOL), magnetic levitation (maglev) and high speed rail. While high speed rail will be a reality along the Northeast Corridor this year, the cost of service may not provide a sufficient incentive for a change from air travel. The effect of the other technologies on transportation demand is not well understood or documented and the City believes that passenger diversion conclusions were vastly overstated. For example, the SAR claimed that telecommunications could divert up to 10 million passengers from air travel by the year 2010. Stephen P. Tocco, when Executive Director of Massport, noted in November 5, 1993 comments on the SAR that Massport did not believe that "teleconferencing and other telecomm technologies will have the impact of easing demand for travel services by 2.5 million in 2010 and 7.2 million passengers in 2030" (SAR, Vol. III, p. B-4).

While telecommunications may play a role (as yet undetermined in scope) in changing business air travel, it will have no impact on pleasure travel. The potential for widespread use of VTOL is unknown and issues such as noise, safety, terminal locations and ground access are unaddressed. Maglev technology has not yet been tested in commercial use in the U.S. and the City is aware of no plans for such testing.

It was determined through data evaluation for the SAR that, "The demand forecast identified the potential need for a facility smaller than the originally envisioned SMA, but larger than that offered by current or potential regional airports" (SAR, 2-11). This report considered the option of a "large regional reliever airport" (LRRA) instead (SAR, ES-7). It urged the state to "reconsider expanded use of one of the air bases or the existing regional airports not as a regional airport, but as a regional reliever airport, with special consideration given to Hanscom Field due to its proximity to the demand" (SAR, ES-5).

According to the SAR, "based on location alone, the Hanscom Field site was more attractive to travelers than the SMA and any other non-Logan site." The report said that initially Hanscom could accommodate 720,000 passengers a year and ultimately take 4.1 million passengers a year away from Logan, compared to an

estimated 3.95 million passengers that could be served at a new second major airport at Ft. Devens (SAR, 3-94 and 5-16). Use of Hanscom as a reliever airport "provides the largest diversion from Logan of any scenario in this study" and "would appear to have a very beneficial effect on the noise and surface traffic impacts on the communities surrounding Logan" (SAR, 5-86).

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In addition, the SAR urged Massport to pursue options to raise Logan's "weighted average peak hour capacity" (see section entitled, "Logan International Airport Capacity Enhancement," SAR, Vol. II, p.4-12). According to the SAR, renewed interest in the long dormant Runway 14/32 proposal grew out of a "Capacity Delay Task Force." But Michael Dawson, a private aviation consultant, in a letter to Massport correcting errors in the report, claimed that the correct name for this group was actually the "Airport Capacity Enhancement Task Force." This is an important distinction, because if Runway 14/32 is in reality a capacity enhancing measure, then the rationale for the runway contradicts Massport's recent statements. It may also violate the Supreme Judicial Court injunction that prohibits the airport's expansion.

Clearly, as the recommendations of both the SAR and SMA were ignored by state officials, Logan now finds itself in a severe capacity crunch and the most obvious target for expansion.

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Peak hour travel time at Logan is a limited resource. Adding another runway is like adding another lane to the Central Artery. It is not a long term solution. Until Massport and a consortium of other public entities can expand capacity at alternative airports within the region, the immediate solution for relieving delays at Logan is to ration the existing resource through demand management policies. As noted in the SAR (Volume II, p. 2-8), "Demand management could prove to be a necessary tool for managing the utilization of the existing capacity if no consensus can be reached on making improvements or additions to existing high-speed inter city transportation infrastructure." The SAR put Logan's "practical capacity" at an average of 95 operations per peak hour. "An unpublished re-assessment by the FAA's New England Region Office in 1992 placed this value at approximately 93.6" (1993 SAR, Volume II, p. 4-11).

The Proponents contend that Runway 14/32, on its own, does not generate any additional aircraft operations or increase in passengers, it merely reduces delays (see DEIS/R 7.0 at 7-3). At the same time, Massport expends considerable effort to argue that the excessive delays at Logan Airport make Boston and Massachusetts less competitive for business and tourism (DEIS/R p. 1.0). However, the proposed new Runway 14/32 will precipitate increased passenger volumes with consequent increases in vehicle-miles traveled. In the past, Massport has cloaked airside improvements under the veil of improved management of existing aircraft operations. But clearly, 14/32 is different and will facilitate a new round of added air service and increases in vehicle traffic on the roads, both locally and regionally.

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Massport claimed that it can seek to remove the injunction against capacity enhancing improvements for "reliever" purposes (Wall Street Journal, April 19, 1999). If this is actually the case, the City questions why Massport has not pursued demand management policies such as peak hour pricing for relief. Unlike an additional runway or alternative airport development, such a solution could be implemented much more quickly at a much lower public cost.

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Massport has indicated that delays at Logan will continue to grow over time whether or not Runway 14/32 is constructed. Constructing a new runway is only a short-term approach and will do little to solve the expanding regional transportation issues that must be addressed through a comprehensive, regional, inter/multi-modal solution.

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In Section 2.5.1 of the DEIS/R (Volume 1, p. 2-38), Massport claims to be "actively engaged in promoting the use of alternative travel choices to provide relief to Logan." Massport talked about relieving congestion at Logan by expanding use of the state's regional airports in Worcester and New Bedford. Yet, after years of talk and so-called plans, Worcester and New Bedford carry the lowest number of passengers of the eight New England regional airports examined in the Regional Air Service Study.

The airport in Worcester, New England's second largest city, retains only nine percent of its service area traffic. This is not much better than Manchester's airport, which retains only 25 percent (DEIS/R, p. 2-18). Together, these two airports lose 4 million passengers a year to Logan (NEC Study, paper #1, p. 2). These travelers represent almost all of the five million passengers who bypass regional airports to drive to Logan every year. And, these five million passengers who bypass regional airports make up roughly 20 percent of Logan's annual passenger traffic (DEIS/R, p. 2-19). 37.81

A Worcester airport study issued in 1995 estimated Worcester's service area demand at 2.2 million, many times more than the 160,000 annual users at the time (NEC Study, paper #1, Table 7). Massport states, "Aggressive service development at the regional airports is the key to recapture the traffic they now lose to Logan." Yet there has been no aggressive service development at Worcester, Hanscom or any other regional airport in Massachusetts, even though Massport claims that "The regional alternatives to Logan airport are an important component of Massport's plan for reducing delays at Logan" (EIS/R 2-48).

According to the New England Regional Air Passenger Service Study conducted by the New England Council in 1995 (NEC Study), the keys to making regional airports more attractive are increased air service at competitive fares and improved ground access as well as shorter drive times and less traffic congestion than the ground routes to Logan (NEC Study, paper #1, p. 6). The NEC Study also found New England's existing regional airports were "capturing less than their full potential demand" and pointed to "significant potential for increased jet service at each of the regional airports" (NEC Study, paper #2, p. 2). This study estimated Logan's total annual operations capacity at 500,000; Hanscom's at 322,000; and Worcester at 282,000.

The City reminds you that Massport's Logan revenues must remain at certain levels to maintain current infrastructure and programming and to provide a return to bondholders. As such, the promotion of other modes of travel or other airports for travel is the promotion of competition for Massport. Massport's unsuccessful record in diverting traffic to other airports makes the City doubt Massport's claim of promoting regional alternatives.

Furthermore, the City notes that the DEIS/R does not include any discussion of the diversion of cargo to off-airport alternatives and, thus, does not comply with the Secretary's Certificate on the ENF. 37.82

Although the DEIS/R states that "The regional alternatives to Logan airport are an important component of Massport's plan for reducing delays at Logan" there has been no aggressive service development at Worcester, Hanscom or any other regional airport in Massachusetts (DEIS/R, p. 2-48).

Essential to the success of distributing air traffic within the region is the development of a comprehensive, inter- and multi-modal transportation system. Such a system should address not only the diversion of passengers from air service but should ensure that travelers have convenient vehicular, private and public transit access to regional transportation hubs. Transit options may include shuttle buses, rail, subway and bus access. In order to minimize air quality impacts, incentives should be offered for the use of alternative fueled vehicles. 37.83

Logan and Worcester Airport survey figures do not distinguish between commuter, charter and other regularly scheduled non-commuter flights. Given the steady growth in small commuter flights to Logan, the City believes that such information is needed so that other airports may examine whether or not there is a commuter market to be captured for their facilities. Overall, this kind of information from regional sources is necessary for long-term planning and strategizing. The City recommends that data yielding this information be part of the evaluation or regional air transit.

Providence and Manchester airports have not diverted traffic from Logan. As for other out of state airports, Massport admits that from 1997 to 1998, "Despite strong growth at T.F. Green [near Providence] and Manchester, passenger traffic was not diverted from Logan. Rather Logan's passenger traffic numbers grew by 3.8 percent in 1998, the highest since 1992" (DEIS/R ES-11).

Laurence G. Hanscom Field

Hanscom Field (Hanscom) is currently the only airport other than Logan owned and operated by Massport. It has been underused as a part of the regional air transport system. In comments on Massport GEIRs, Annual Updates and project filings, the City has long advocated for improvements to Hanscom that would make it an attractive alternative to Logan for both airlines and passengers. Its potential as a regional facility has been ignored in the DEIS/R and should have received substantial attention in the alternatives analysis.

The DEIS/R notes that no regional carriers have successfully served Hanscom in the past 15 years. As the City has noted in numerous past comment letters, Massport has not invested the funds necessary for infrastructure improvements that would attract cargo and regional service.

General Aviation (GA) activity (private and corporate aircraft) at Logan represents 6.2% of total airport operations. For the four quarters ending in December, 1998, Logan GA activity numbered 31,712 flights. GA flights now landing at Logan could easily be redirected to Hanscom since these are private and corporate, rather than commercial, aircraft. These planes are generally very small and delay larger commercial planes carrying many more passengers. Hanscom could be upgraded into a first-class destination for GA with facilities that would entice many private entities to make the switch. In combination with Peak Period Pricing at Logan, Hanscom could well become a convenient option for many travelers.

Hanscom could also be developed into a Northeast hub airfield offering service to major destinations such as New York, Washington D.C., Philadelphia, Pittsburgh, Cleveland and Detroit. This regional focus would allow suburban business people and residents the opportunity to fly to regional destinations as an end trip or as a connecting point to other destinations. The seven regional destination sites respectively rank 1st, 2nd, 8th, 22nd, 29th and 18th of the top domestic Origin and Destination markets in the U.S.

A problem for Logan is that Boston serves as a regional hub for most of the smaller cities of New England such as Burlington (VT), Portland (ME), Martha's Vineyard, Provincetown and Nantucket. Such cities are served exclusively by small regional and commuter aircraft. Such flights accounted for 40% of all flight operations out of Logan in 1998. Developing Hanscom as a feeder facility for flights within the Northeast could result in a reduction in Logan's flight operations significantly.

Finally, extending the MBTA's Red Line from Alewife to Hanscom should be considered as an access option as should a connection with the Fitchburg Commuter Rail line that now stops in Lincoln and Concord.

Worcester Airport

A December, 1995 Final Supplemental Environmental Impact Statement/Report (FSEIS/R) outlined improvements planned for the Worcester Airport (Worcester) and presented a section (2.0) titled Worcester Airport's Role and Potential for Growth. Worcester is designated by the FAA as a Primary Commercial Service Airport and, under the National Plan of Integrated Airport Systems (NPIAS), as a Transport-Short Haul Airport. It was designated for priority improvement funding by MAC in the 1989 Massachusetts Airport System Plan (MASP) and determined to be not capable of becoming a major hub airport. Its primary mission was identified as service to its own geographic market based upon regional business and economic needs and not to duplicate or handle the overflow from Logan.

A number of factors contributing to the limited potential for airport growth in Worcester were cited in the FSEIS/R. The airport is surrounded by steep topography and the wetlands that border tributaries to a public water supply reservoir, leaving little developable land. The airport's high elevation (1,113 feet above sea level) can limit operations by aircraft equipped to fly on Visual Flight Rules (VFR) and cloud cover causes Instrument Flight Rules (IFR) traffic about 15 percent of the time. Lack of direct highway access and airspace constraints as a result of FAA safety regulations further restrict the potential for expansion.

The Worcester FSEIS/R cites a 1984 Massport survey of Logan passengers showing that about 238,000 enplanements came from outside of Route 495 with the Worcester Airport market generating approximately 256,000 total enplanements. The number of Logan enplanements represented a loss of one-half of Worcester's potential market to Boston. No information was provided regarding the destination of Worcester area passengers and the City questions if such data was gathered during the Massport passenger survey and might be useful in regional planning.

The Sabre Report, undertaken for MAC, claimed that at Worcester "a reasonable case can be made for initiating scheduled jet aircraft service into some of the more attractive northeast hubs" such as Newark, Philadelphia, Cincinnati, Detroit and direct service to four destinations in Florida (Sabre Report, p. 1-2). The study identified an advantage for Worcester because of "air traffic congestion and mounting ground access problems in getting to Logan." As for cargo, it found that much of the Worcester market's freight was trucked to Logan, even though truck drivers complain of problem traffic en route to and from Logan. It identified Federal Express and United Parcel Service (UPS) as having potential interest in Worcester. Yet, the report noted that, "The major problem for this airport is access. The airport does not have direct access to any interstate highways or other major limited access highways" (Sabre Report, p. 5-6). The study indicated that the maximum acceptable drive time from the highway to the airport would have to be no more than 5-15 minutes (Sabre Report, p. 8-25). The report further stated that the MBTA's Commuter Rail service to Worcester from South Station may siphon off more of Worcester's air travelers because the rail line does not extend from downtown Worcester to the airport, four miles away (Sabre, p. 5-50.)

Although Worcester may not serve as a primary reliever for Logan, it is fundamental that improved access, preferably off Interstate 90, be addressed first and foremost when planning to expand operations at this facility. In addition, heavily discounted Landing Fees, Gate Fees and a limited tax exemption for airlines serving Worcester Airport may help to attract service.

The discussion of Worcester's regional role in Section 2.3 of the FSEIS/R indicates MAC's acknowledgment in the MASP that capacity at Logan is a problem. It also appears that the issue of duplicating Logan's mission has been discussed. This recognition by MAC is significant and, once again, confirms the City of Boston's conclusion that increasing capacity is the guiding motivation behind Runway 14/32.

37.86

Fort Devens

37.87

It is our understanding that decisions have not yet been made regarding the use all of the land at Fort Devens. The City believes that evaluation of the site's potential role in a regional transportation system should be assessed. Data on land availability, ground access, suitable types of aircraft and infrastructure should be assembled and examined to determine if this site is a viable option for a reliever airport.

QUALITY OF LIFE: IMPACTS ON COMMUNITIES

37.88

The DEIS/R, like other Massport project documents, does not adequately address the very real problems and needs of those most affected by airport operations on a daily basis. The safety of Massport and airline staff and air passengers and the quality of passenger service is always accounted for. However, the quality of life of those who live and work in Logan's zone of impact is clearly not acknowledged. For example, the DEIS/R states that this five-year construction program will be conducted up to seven (7) days per week with frequent night work. This aggressive schedule reflects FAA and Massport priorities at the expense of neighbors. The DEIS/R also maintains that service levels at regional airports are primarily based upon the state of the economy and airline decisions, not community impacts. As another example, while the cost of delay for air passengers and airlines is estimated, there is no acknowledgment or discussion of the landside loss of personal and work-related time or the costs of impacts on residents and businesses.

37.89

The DEIS/R states that, due to the airside improvements project, areas such as parkland, farmland and cultural resources will not receive impacts or will receive insignificant impacts. This is inaccurate and one example is the projected increase in flights over Franklin Park. This parkland is an important resource in a dense urban area populated by many people of color and is on the National Register of Historic Places.

BASE YEAR AND FORECAST PLANNING PERIOD

37.90

Finally, as further evidence that this DEIS/R is insufficient, the City notes two issues fundamental to conscientious local and regional transportation planning: the choice of a base year for modeling and the forecast planning period.

The base year in the DEIS/R for modeling and forecasting is 1993, six years ago. Given the changes in fleet mix and other baseline conditions, 1993 is an inappropriate base year.

Projections for 1999 are inappropriately called "near-term" rather than 'current activity' and the year 2010, only 11 years in the future, is called the "long term." The DEIS/R short- and long-term time horizons do not conform with generally accepted planning practices or with FAA standards. The result is an analysis that relies upon outdated information and inadequate forecasting. At a minimum, planning and forecasting for this project should carry through the year 2020.

In summary, the City of Boston believes that Massport's withdrawal of this document and the formation of a regional transportation panel is the most responsible way to enhance regional capacity. It will also ensure that the impacts inherent in accommodating economic growth are evenly distributed.

Thank you both for the opportunity to offer comment. The City look forward to contributing to the solution to our region's transportation needs.

Sincerely,



Andrea d'Amato
Chief of Environmental Services



Antonia M. Pollak
Director of The Environment Department

Attachments

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CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
THOMAS M. MENINO

March 26, 1999

The Hon. Robert A. Havern III
Chairman
Joint Committee on Transportation
State House, Room 513
Boston, MA 02133

The Hon. Joseph C. Sullivan
Chairman
Joint Committee on Transportation
State House, Room 443
Boston, MA 02133

Dear Mr. Chairmen:

Thank you for allowing me to testify before your Committee last Tuesday on the proposed runway expansion at Logan Airport.

I endorse the proposal for the Commonwealth to create an independent commission to study the runway expansion at Logan Airport. And I would charge the commission to undertake a regional air traffic improvement plan.

I also suggest that the Commonwealth place a moratorium on the runway expansion project until this plan can be completed. There are far too many unanswered questions to allow the runway to proceed:

1) there are questions about Logan Airport's long term capacity to serve growing air traffic demand in the region, particularly the growing territory beyond Route 128; according to a recent New England Regional Air Service Study prepared for the Massachusetts Aeronautics Commission and the Massachusetts Port Authority under a grant from the Federal Aviation Administration, "Regardless of author or methodology, everyone agrees that Logan will soon be unable to meet demand"; another runway at Logan will not solve this problem if this is the case;

37.91

- 2) there are questions about whether already congested urban highways can absorb larger volumes of suburban traffic; in 1998, for the very first year, more than half of Logan's passengers came from beyond Route 128; the long term trend of growth at the metropolitan edge shows the Port Authority needs a strategy to serve businesses and passengers in the growing suburban market, without inviting more suburban vehicles onto congested urban roads; 37.92
- 3) there are questions about the environmental and economic impacts of more congested highways; the Port Authority projects Logan will soon serve 45 million passengers a year, up from 26 million in 1998; commuters who will share the roads with Logan's passengers and residents of surrounding communities who will share the air deserve an accounting of the environmental and economic costs of more traffic congestion and delays on urban roads; 37.93
- 4) there are questions about genuine causes of delays at Logan other than northwest winds, such as the inability of airlines to find attractive alternative airports in the region; if delays actually stem from airlines scheduling far more flights than Logan is capable of handling, then adding capacity will not solve the problem, it will only allow the problem to grow worse; in fact, the Port Authority projects delays of 59 minutes per flight by 2010; the only real solution is to improve other airports as more attractive alternatives for the airlines; 37.94
- 5) there are questions about Logan's high volume of small planes that could be accommodated at smaller, regional reliever airports; some 45% of Logan's flight capacity is planes with 40 passengers or less; small planes are inefficient users of airport capacity at peak travel times; without adding a runway, Logan can reduce this percentage through market mechanisms geared to relieve congestion, such as peak pricing; 37.95
- 6) there are questions about the suitability of alternative airports or the readiness of alternative regional airports to handle increased traffic and meet demand projections; the effects of physical improvements to existing airports, ground access infrastructure, as well as improvements to Logan Airport need to be studied in a regional context, not in isolation; 37.96
- 7) there are questions about the need to preserve available sites for potential air fields; with Logan at capacity, the state needs to reexamine the suitability of Ft. Devens for a new regional reliever airport to serve growing demand along the I495 and I28 corridors; Ft. Devens is sited near I495, Route 2, and I195 to Worcester, as well as existing commuter rail lines; the advantages of existing ground access infrastructure at this site should not be overlooked; 37.97
- 8) there are questions about the regional economic benefits of airport expansion and infrastructure improvements at all facilities in the region, especially Worcester Municipal Airport; Hanscom Field in the Route 128 corridor; and the Ft. Devens site and its proximity to the I495 corridor, Fitchburg, Leominster and Lowell; and 37.98
- 9) there are questions about whether prohibiting a new runway at Logan would actually have any undesirable consequences to the efficiency of Logan's operations or the region's economy; Logan Airport is growing mightily without the runway anyway; when a new runway was proposed 25 years ago by Massport director Ed King, supporters said the region's economy would suffer if the runway did not open; in fact, the region's economy has exploded and traffic at Logan Airport went from 8 million passengers to 26 million a year. 37.99

I endorse your proposal for the creation of an independent commission, because a regional air traffic improvement plan is the only way for the Commonwealth and our neighboring New England states to study all of these issues in a regional context.

This region's economy, transportation networks, environment, and quality of life cut across too many boundaries to be addressed in isolation or by piecemeal approaches. That is why I call upon the Commonwealth to declare a moratorium on the new runway at Logan Airport until a regional air traffic improvement plan can be completed.

Sincerely,

Thomas M. Menino
Mayor of Boston





CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
THOMAS M. MENINO

For Immediate release
March 23, 1999

Contact: Press Office
635-4461

**MAYOR MENINO SAYS MASSPORT RENEGING ON COMMITMENTS
AND LACKS REGIONAL PLANS FOR GROWING AIR TRAFFIC**

The following is Mayor Thomas M. Menino's testimony prepared for delivery at the State House on Tuesday, March 23, 1999:

"Mr. Chairman, I come here this morning on behalf of the citizens of Boston to declare my strong opposition to the runway expansion at Logan Airport. And I voice my support for legislation that will prevent that runway from opening.

My reason for doing so is simple. The runway is a violation of Massport's commitments that traffic at Logan would not grow.

I submit for the record testimony to that effect made by former state transportation secretary Frederick Salvucci in last week's *Boston Globe*. Mr. Salvucci said the state agreed to a cap on Logan traffic. He said, and I quote, "The commitment was clear." Now, in just a matter of years, Massport is renegeing on that commitment.

I also submit for the record a report in this week's *Boston Business Journal*. I refer to comments made by former Massport executive director Al Raine, who served under the Weld-Cellucci administration. According to this report, and I quote, "Raine said the commitments were crucial in persuading East Boston residents not to mount what he believes would have been a successful legal and political fight..."

37.100

Mr. Chairman, there is a fight today because Massport said it would abide by a cap in air traffic. But now, Massport says there is no cap. That is how Massport deals with the people of Boston. They have pushed us before. They have pushed us time and time again. But this time, the people of Boston will not be pushed without a fight.

The only solution Mr. Chairman, is for the Commonwealth to get serious about a regional solution to a regional problem.

37.101

The runway is not a regional solution. It is a short term band aid, a temporary crutch, a quick fix for an agency that shows an incredible lack of regional vision. An agency with no long term plans for what to do after Logan fills up again.

Relying on other states to improve their airports is not a smart strategy for the Commonwealth. It leaves too much to chance. And worse, it gives those states a chance to capture the economic growth that will be drawn to an alternative airport. The Commonwealth could capture those benefits only if it builds another major airport to serve the region, or expand existing airports like Hanscom Field. Hanscom is in the best position to serve growing businesses along Routes 128 and 495. Not Logan.

37.102

Business people at the edge of the metropolitan region will not be well served by a new runway at Logan. Because the runway will put more airport traffic on the Expressway and the Massachusetts Turnpike. A new runway at Logan will only mean more congestion and delays on our highways. Those delays will mean lost time, lost productivity, and a loss of quality of life.

37.103

Mr. Chairman, I'm not anti-business. I'm not anti-development. I'm pro common sense.

The quality of life in Boston is what keeps our economy strong. Every business leader knows that greater Boston cannot compete with other regions based on the cost of living. We beat the competition because our quality of life ranks among the highest in the nation.

Adding more traffic to congested highways will only weaken our quality of life – and our regional economic advantage. Without an alternative airport, greater Boston has no regional advantage when it comes to air travel.

Yet, Massport has no serious plans for what to do when Logan reaches its new capacity. And until Massport gets serious about a regional solution to a regional problem, the people of Boston cannot take Massport's commitments seriously at all.

For the sake of our regional economy, and for the sake of our quality of life, I suggest that the Legislature stop the new runway at Logan Airport, and take all necessary steps to explore alternative ways of handling the growing air traffic in our region.

37.104

Opening another runway at Logan Airport is a band-aid approach to a problem that requires surgery. The most serious delays at Logan are caused by the lack of attractive alternative airports in greater Boston for airlines and consumers. Without appealing alternative options, more traffic will continue to go to Logan. But Logan can only accommodate so much.

37.105

According to Massport aviation director Thomas Kinton, "Ultimately there will be a ceiling that will be hit." (Boston Globe, 6/19/94) As far back as four years ago, Kinton said, "Logan can't continue to handle it all any more." (Boston Globe 11/28/95) As a Federal Aviation funded "New England Regional Air Service Study" put it, "Regardless of author or methodology, everyone agrees that Logan will soon be unable to meet demand."

37.106

More traffic at Logan will only mean more cars, trucks and shuttle buses on our congested highways and urban road system. Logan now serves 26 million passengers a year. Massport expects up to 45 million a year by 2010, an increase of nearly 80 percent. Imagine the impact on traffic on the Expressway or the Mass Pike during rush hours.

The majority of Logan's users came from beyond Route 128 in 1996. (Massport data.) Why? Growth is occurring at the metropolitan edge. And Logan remains greater Boston's only major airport. As more and more travelers fight traffic on urban roads to get to Logan, the people who work and live beyond Route 128 won't be able to get to Logan on time. Attracting more traffic to Logan will only make these delays worse.

Even Massport admits the new runway won't solve the airport's problems. According to a 1995 report in The Boston Globe, Massport's aviation director Thomas Kinton said the new runway at Logan "won't ease the congestion that now ranks Boston as the nation's fifth worst city for flight delays. This record undoubtedly will get worse, he said, if Logan's passenger traffic grows as expected, from 25 million people this year to a projected 45 million in 2010." (Boston Globe, 12/24/95)

For years, Massport planners have talked about relieving congestion at Logan by building a second major airport or expanding the use of the state's regional airports in Worcester and New Bedford. "Diverting travelers from Logan, they say, is about the only way that they can see to relieve growing congestion and delays in Boston." (Boston Globe 12/24/95) Yet, after years of talk and so-called plans, Worcester and New Bedford carry the lowest number of passengers of all of New England's ten largest regional airports.

37.107

Talk of a new runway has been around for 25 years. But Boston's economy and traffic at Logan Airport have grown without it. Even without a new runway, Boston's economy will continue to grow. And so will congestion at Logan - until the region comes up with a seriously overdue plan to meet its long term needs.



CITY OF BOSTON • MASSACHUSETTS

OFFICE OF THE MAYOR
THOMAS M. MENINO

April 7, 1999

The Hon. Robert A. Durand
Secretary of Environmental Affairs
Attention MEPA Office
100 Cambridge Street, 20th Floor
Boston, MA 02205

Dear Secretary Durand:

The Massachusetts Port Authority projects that passenger traffic at Logan Airport will grow from 26 million in 1998 to as many as 45 million by 2010, an increase of roughly 73 percent.

More passenger traffic at Logan Airport will only mean more cars, trucks and shuttle buses on our congested highways and urban road system. During peak travel times, this could make traffic congestion unbearable on the Southeast Expressway and Route 1A. It will also encourage more drivers to seek alternate routes, worsening congestion on roads such as Storrow Drive.

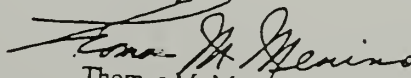
The majority of Logan's users actually come from beyond Route 128, according to Massport's 1996 data. These people are not getting to Logan via the Blue Line. They are driving long distances for great lengths of time on congested roads. As traffic at Logan expands, road traffic congestion will grow worse, more vehicles will slow to a crawl, and suburban travelers may not be able to get to Logan on time.

Putting more traffic on our urban road system during peak travel times raises the issue of whether residents near Logan Airport will be able to navigate their own communities and whether employees will be able to travel to and from work without further delays.

Finally, the addition of more vehicles to our roads raises concerns about environmental and economic impacts of traffic congestion, from air pollution to lost time and productivity. The region is already in "serious" non-attainment of the air quality standard for ozone, according to the U.S. Environmental Protection Agency.

Massport's Environmental Impact Statement/Report addresses none of this. It is incomplete, because it avoids the landside impacts of airport growth. Airside and landside impacts are related and inseparable. I therefore respectfully request that you require the Port Authority to provide a full and complete accounting of all the landside impacts of its improvement plan before proceeding any further. To do so would only deny the people of greater Boston the answers we deserve.

Sincerely,


Thomas M. Menino





April 20, 1999

Andrea d'Amato
Secretary
Boston Transportation Department
Boston City Hall
Boston, Massachusetts

Dear Secretary d'Amato:

As the Executive Director of the Boston Public Health Commission (BPHC), the City's health department, I am concerned that the Massachusetts Port Authority, the US Transportation Department and the FAA Logan Airside Improvements Planning Project, DEIR/DEIS, have not taken into consideration the health of Boston residents in their Logan Airport expansion plan. This is particularly worrisome because of the potential impact on some of the City's most vulnerable subpopulations who are already disproportionately affected by negative environmental factors. Furthermore, the failure to consider such matters appears to be out of compliance with President Clinton's Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", which requires each federal agency to identify and address the environmental and health effects of its programs that particularly burden minority and low income communities.

37.108

Our recently released 1999 Health of Boston Report to the Mayor documents the ten leading causes of morbidity and mortality which include cancer, heart disease, respiratory disease, asthma and homicide among others. When these data are broken down by neighborhood, they show that some of the worst rates for these health problems are present in the low income/minority neighborhoods of East Boston, Dorchester, Roxbury, South Boston, Mattapan and South End. Because of the proposed redirecting of airport landings and take-offs as well as the increased automobile traffic, these very communities may be the ones most affected by the proposed changes.

Many of the most serious health outcomes in our Report have been shown to be related directly or indirectly to factors associated with outdoor/indoor air pollution (such as that produced by aircraft/and traffic emissions), noise and odor problems. The DEIR/DEIS claims that environmental impacts resulting from emissions, noise and odor are negligible or within established state and federal guidelines/standards. We question this conclusion. Because many of the vulnerable demographic subpopulations are

37.109

already overburdened and susceptible to public health problems, any incremental insult from the environment, regardless of size, is potentially of significance.

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The DEIR/DEIS proposes to use soundproofing to mitigate noise impacts in certain neighborhoods. The process of soundproofing residences and businesses can create indoor air-quality problems. And this would occur just at the time the BPHC is launching a campaign to identify and reduce contributing factors to high asthma/respiratory disease rates in the city. There is no acknowledgement of such secondary impacts in the DEIR/DEIS.

Furthermore, noise and odor impacts have been associated in some studies with decreased learning and increased aggression. In Boston's neighborhoods affected by the redirection and new traffic which will result from this project, decreased learning and increased aggression are issues of concern which should also be addressed.

37.111

The BPHC, strongly recommends that Massport, the US Transportation Department and the FAA commission the appropriate studies that will document whether or not there are real health impacts on affected Boston neighborhoods associated with the proposed Logan project. The BPHC is available to participate in the design and implementation of such an effort.

37.112

If you have any questions about this matter, please call me or John Rich, MD, MPH, our Chief Medical Officer, at 617-534-5264 or Ngozi Oleru, Ph.D., the Director of the Office of Environmental Health, at 617-534-5966.

Sincerely,



John Auerbach
Executive Director

cc: John Rich
Ngozi Oleru
Lise Fried

**COMMENTS OF THE
BOSTON REDEVELOPMENT AUTHORITY
ON THE
LOGAN AIRSIDE IMPROVEMENTS PLANNING PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT
(EOEA #10458)**

Pursuant to regulations implementing the Massachusetts Environmental Policy Act (M.G.L., Chapter 30, Sections 62-62H and the National Environmental Policy Act of 1969, as amended (40 CFR, Part 1500) the Boston Redevelopment Authority has reviewed the above referenced Draft Environmental Impact Statement/Report and is pleased to submit the following comments.

The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the Logan Airside Improvements Planning Project evaluates seven airside improvement concepts for Logan International Airport, including both physical improvements and administrative options, which have been packaged for analysis into four improvement alternatives, plus a no-action alternative. The preferred alternative, denoted as Alternative 1A, consists of the following improvements:

- (1) Construction of a new 5,000 foot unidirectional runway 14/32 along the southwestern edge of the airport,
- (2) Construction of a 9,300 foot centerfield taxiway located between Runways 4L/22R and 4R/22L,
- (3) Several taxiways improvements, including reconfiguration of the southwest corner taxiway system, the extension of Taxiway Delta to Runway 4R/22L, and the realignment of Taxiway November between Runway 15L/33R and Runway 33L/15R, and
- (4) Reduction of the approach minima for Runways 15R, 22L, 27, and 33L

Not included in the Preferred Alternative is peak period pricing, an improvement concept evaluated in some of the alternatives. The stated purposes of the Airside Improvements Project are to reduce current and projected levels of aircraft delay at Logan and to maintain and enhance safe operating conditions at the airport.

The Massachusetts Port Authority (the operational authority for Logan Airport) and the Federal Aviation Administration have presented a very detailed document identifying and evaluating the operational and environmental implications of various alternatives for reducing the aircraft delay problems at Logan. An extensive, and sometimes overwhelming, amount of information and data are presented for review. Although seemingly cogent arguments are presented to support the recommended actions, we nonetheless do have serious disagreements with much of the analyses and resulting proposals, some of which

admittedly are highly controversial. In our comments below we have, inter alia, attempted to suggest alternative solutions to the recognized transportation difficulties which presently exist and are projected to increase at the airport.

REGIONAL CONSIDERATIONS

To begin, we strongly support the position of Mayor Thomas Menino and the City of Boston that there needs to be a regional approach to resolving the current problems at Logan Airport. We firmly believe that the solution to these problems cannot be solved solely by improving conditions only at the Logan. The problems are considerably more complex and extensive, involving the entire New England region, and are compounded by the fact that only a single major airport is available to serve the region's principal city. A significant and growing proportion of travelers who use Logan live in outlying areas to the north, west, and south of Boston and could be far better served by existing regional airports such as Manchester, Worcester Municipal, and T.F. Green if these airports were as substantially developed as Logan. In our opinion, both the State and Federal governments have the obligation to devise a strategy to encourage and to ensure that a much higher percentage of the burden at Logan is relieved by regional commercial airports, which we are confident would welcome increases in regularly-scheduled passenger service. The dramatic growth at Manchester Airport in New Hampshire and at T.F. Green in Rhode Island – both of which reportedly grew at more than 50 percent this past year – clearly demonstrates that people are willing to use alternative airports to Logan if there is a choice for a particular market segment. Were the same level of effort devoted to improving the attractiveness and the facilities at these and other regional airports as Massport has put into the present proposals for Logan, a more realistic regional share of the air traffic burden should be able to be achieved.

37.113

We also want to express our support of the proposal of Mayor Menino that an independent commission, or "blue ribbon panel" be established to study objectively the opportunities for regional air traffic improvements and the environmental and economic impact of further expansion at Logan. This commission should explore, along with the greater use of the existing regional airports, the possibility of developing a second major airport (which could be one of the regional airports) to serve the region's growing economy and demand for service. Until such a panel has had the opportunity to devise a feasible and acceptable regional aviation transportation strategy, we would recommend a moratorium on any new airside construction or expansion at Logan, save for those actions needed to ensure the safe operation of the airport itself. We likewise support the Mayor's suggestion that a regional New England Port Authority be established to implement a regional transportation strategy, replacing the limited focus of Massport.

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37.115

REGIONAL AIRPORTS

Manchester/T.F. Green

37.116

Regional airports offer a highly feasible resource to attract a large proportion of demand from Logan. Manchester and T.F. Green Airports, for example, already are demonstrating their ability to act as major alternatives to Logan.

Manchester Airport in Manchester, New Hampshire handled 1.94 million passengers last year, compared to just 108,000 in 1984 and 700,000 in 1990 (an astounding 1,685% increase); and an estimated 2.5 million are expected to use the airport this year, growing to 3.2 million people in the year 2000, making Manchester the fastest growing airport in the country. Between 1992 and 2004, Manchester Airport will have been entirely rebuilt, including the lengthening of its two runways and ILS upgrades to accommodate its growing demand, and plans are proceeding to construct a toll-free access road connecting Route 3 with the airport's terminal. Three new airlines have begun service at Manchester in the past year, and just recently airport officials announced that at least three additional airlines are considering starting flights at the airport.

T.F. Green Airport in Warwick, Rhode Island, just south of Providence, has a new \$225 million, 19-gate terminal and also is growing rapidly. In 1990, the airport served about 2.25 million passengers, which more than doubled to 4.5 million in 1998 as a result of affordable fares and convenience. Studies have shown that about 30 percent of Green's traffic comes from Massachusetts, traffic that otherwise most likely would have gone to Logan. This number is expected to grow dramatically in the next few years due to plans (noted in the Draft EIS/EIR) of the Rhode Island Department of Transportation to build a new MBTA commuter rail station at Green, effectively linking Boston to the Warwick airport with as many as eight trains daily. The project also includes a moving sidewalk to take passengers from the trains to the terminal.

Worcester Municipal Airport

Worcester Municipal Airport, currently mostly underutilized in spite of significant marketing, technical, and planning assistance by Massport in recent years, offers another excellent potential for capturing a large share of air traffic from Logan. Worcester Airport has four jetways, with new lighting to ease a frequent fogging problem, and additional improvements are planned within the next few years. In 1989, approximately 380,000 passengers passed through the airport, but that number has declined to 76,000 today. At peak capacity, Worcester reportedly could handle 1 to 2 million passengers a year and this easily could serve the estimated 1.5 million people from central Massachusetts who fly out of Logan annually. Critical to its success is improved highway access from the Massachusetts Turnpike and from Interstate 290, and possibly even a link to the Worcester commuter rail service. We are especially pleased that Massport

recently announced plans to take over operations, and eventually ownership, at Worcester Municipal Airport. This is a first step in the right direction to develop a regional solution to Logan's capacity and delay problems. In the meantime, we strongly urge Massport to put the same energy in promoting and developing the use of Worcester as an alternative to Logan as it has in developing the Airside Improvements Project.

Pease International Tradeport

Curiously, little attention was given in the Draft EIS/EIR to the opportunity offered by Pease International Tradeport just outside of Portsmouth, N.H. Pease has an unusually long 2-mile runway and recently completed a \$5.6 million international terminal, including custom facilities. According to airport officials, Pease currently handles approximately 30,000 general aviation, cargo, and military operations per year, but expects to increase that number to 100,00 by 2010, with more than 40,000 passenger flights. The airport is actively soliciting charter flights, cargo service, and in particular international flights and has the capacity to expand its services substantially. While its single runway may be a drawback, Pease, along with Manchester, deserves to be considered as a feasible alternative to Logan for those passengers living and working north of Boston.

DELAY ANALYSIS

As numerous commenters have stated, we believe that the delay data and analysis used by Massport to support its proposals, especially the new Runway 14/32, is highly questionable and overstates the actual problem. While we do, of course, acknowledge that aircraft often are delayed at Logan, this is a situation that is no different than what occurs at any major airport. In fact, it has been reported that even Denver's new state-of-the-art Centennial Airport had 29 percent of its flights delayed last year, higher than Massport's claim of 25 percent for Logan.

We believe that Massport's analysis basically is flawed for several reasons. First Massport chose to develop its own model (DELAYSIM), rather than an accepted FAA model to determine delay. Further, Massport based its model on data from 1993, a peak year for delay at Logan, rather than averaging several years of data (as it did for the weather data, arguing that use of a single year would misrepresent normal conditions. Thus, there is an obvious inconsistency in Massport's use of data to support its position.) In fact, FAA statistics on delay at Logan since 1993 have indicated an approximate 19 percent decrease in delays between 1993 and 1998, information not included in the Draft EIS/EIR. As a result, we feel that Massport's delay projections are unrealistically inflated.

In addition, in contrast to Massport's estimates of an approximate 25 percent delay at Logan, FAA data indicate the problem to be substantially less, with only slightly over 3 percent of operations delayed at Logan in 1998. This difference is

due to the fact that the FAA considers any flight arriving or departing within 15 minutes of the published schedule to be on time, whereas Massport considers any flight which does not arrive or depart as scheduled to be delayed. We believe that the FAA methodology is more realistic of actual operating conditions, due to the many uncertainties involved in air travel (changes in weather conditions, conditions at connecting airports, etc.) and that air travelers generally expect slight delays. Also missing from the equation are the times when aircraft arrive ahead of schedule.

Further, by considering only the scheduled time of departure or arrival at Logan as the sole determinant of delay, Massport's methodology ignores situations which are entirely external to Logan, such as delays at originating or destination airports due to adverse weather conditions, over-scheduling, or other reasons (a flight which is delayed in arriving at Logan because of delayed departure from another airport due to adverse weather at the airport, for example, is not a delay problem for which Logan is responsible). Since the Draft EIS/EIR does not present any comprehensive analysis of the several potential causes for delay, the conclusions are misleading.

In sum, then, we feel that the data and methodology used by Massport to calculate existing and future delay do not realistically portray the normal operation of a major U.S. airport and overstate a problem in order to support a pre-conceived program of airside improvements.

PART 150 STUDY

Prior to the construction of the proposed improvements, we recommend that Massport conduct a Federal Aviation Regulations (FAR) part 150 noise compatibility study, which would set forth measures to be taken by Massport to reduce incompatibility in land uses and prevent additional incompatible land uses in the vicinity of Logan Airport. A Part 150 study, in turn, would trigger an FAR part 161 study for a program of noise abatement and restriction, which could provide for a voluntary control of the number of flights to Logan through agreements between Massport and the airlines serving the airport.

We believe that limiting or restricting uncontrolled growth of operations at Logan is imperative and could serve as an alternative means to reduce the current and projected future flight delays. We note again that although Logan (in 1997) was the 17th busiest airport in the U.S. in terms of passenger traffic, it was 11th in aircraft operations and that generally over the past fifteen years, the number of flight operations have increased at a higher rate than the growth of air passengers. Because the growth in flights exceeded the growth of air passenger traffic, passengers per flight at Logan have actually declined (from 58 to 56 passengers). The result is a tendency for an increasing number of aircraft to carry a lesser number of passengers. Rather, the goal for Massport should be to establish a demand management policy which could encourage airlines to

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maximize load factors. Eliminating or consolidating flights to provide higher load factors than presently exist would, in turn, not only reduce the number of operations and maximize airline revenue, but also result in delay reduction.

RUNWAY 14/32

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The major element of the Logan Airside Improvement Planning Project is the proposed construction of Runway 14/32, a new 5,000 foot runway to be located along the southwestern edge of the airport. According to the Draft EIS/EIR, Runway 14/32 would be designed as an unidirectional runway, with all arrivals over Boston Harbor to the Runway 32 approach and all departures from the Runway 14 end out over the harbor. His new runway has been proposed to address the principal cause of delay at Logan – the substantial drop in airport capacity that occurs when moderate to strong northwest/southeast winds force the airport to operate with fewer than three runways – by providing a second effective parallel runway in the northwest/southeast orientation.

The City of Boston has consistently opposed this proposal, which was originally included in the 1970 Airport Layout Plan. Construction of this runway actually began in 1974 but was halted as a result of an injunction successfully obtained by the City and East Boston residents. The injunction remains in effect to this day. While we acknowledge the fact that construction of Runway 14/32 could, to some extent, reduce the occurrence of delays at the airport – although delay would only minimally be reduced; by Massport's own analysis, future projected delay would be reduced by only approximately 20 percent – and could help the FAA to achieve better compliance with the runway use goals set forth in the Preferential Runway Assignment System (PRAS), we feel that a fair and equitable distribution of aircraft operations can be achieved through alternative measures and without the construction of a new runway. In particular, we would recommend that Massport officials work together with FAA tower personnel to thoroughly examine the PRAS program to determine whether there may be appropriate changes to the program that would result in a superior noise abatement policy to that currently in place. In addition, as detailed earlier in this letter, we believe that taking a more long-term regional approach to resolving the delay/capacity problem at Logan would be far more environmentally beneficial to further runway construction at Logan.

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In examining the extensive data presented in the Draft EIS/EIR, we conclude that the alleged benefits of constructing Runway 14/32 may be highly overrated by Massport. In fact, according to Table 4.5-1, total annual delay hours for the 2010 High Fleet scenarios would be greater with the implementation of Massport's Preferred Alternative 1A (which includes Runway 14/32 but excludes Peak Period Pricing) than for Alternatives 2 and 3. Massport predicts that in a 37.5 million High Fleet passenger scenario, there would be 249,600 total hours of delay with the implementation of Alternative 1A, whereas with implementation of Alternative 2, which omits construction of Runway 14/32 but includes Peak

Period Pricing, total delays would drop to 208,300 hours. With implementation of Alternative 3, which excludes any infrastructure changes but includes Peak Period Pricing and the reduction in approach minima, total annual delays are reduced to 213,200 hours. Similar percentages in the total annual hours of delay occur under the 45 million High Fleet scenario. Presumably, the same conditions would occur under a 45 million Low Fleet scenario, because of its similarity to the 37.5 million High Fleet scenario. Only under the 37.5 million Low Fleet scenario, where non-jet, commuter operations represent a smaller share of the fleet serving Logan, would construction of Runway 14/32 alleviate a greater share of the delay. Thus, if a High Fleet scenario develops at Logan, the construction of Runway 14/32 becomes more of a hindrance and is no longer effective without additional mitigation measures. This analysis also points to another problem. Since the High Fleet assumes a fleet mix with significant regional operations at Logan, an improvement could only occur if there is a substantial transfer of the regional operations from Logan to other airports, as we have recommended above.

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Implementation of Runway 14/32 will result in substantial noise impacts on many of the greater Boston area communities. Although operation of the runway would cause a shift in flight tracks and the volume of flights over certain communities, lessening the intensity of noise, it would increase the noise impacts, in some areas dramatically, in several other neighborhoods. Overall, implementation of Runway 14/32 would widen the scope of communities exposed to noise levels equal to or greater than 65 db by 2 percent, over the other alternatives.

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Although Massport claims that Runway 14/32 would be unidirectional only and that conditions would be placed on its use to restrict any future change to unidirectional use, there can be no guarantee that a change would, in fact, not happen. It is our understanding that Massport will not agree to any legally-binding agreement to maintain the unidirectionality of this runway in perpetuity. Should bidirectional use of this runway be implemented sometime in the future, this would result in significant, and potentially dangerous, impacts, particularly on the Jeffries Point neighborhood of East Boston, in terms of noise, air quality, odor, and safety issues. Adverse impacts also could seriously affect the now-developing South Boston Seaport community and could hinder future plans for this area.

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We also have some concerns with the type of aircraft that would use Runway 14/32. Although Massport states that the primary users of the runway would be the smaller regional jets and turbo prop commuter aircraft, the runway would be provided with a larger safety area to accommodate "occasional use by larger jets" (pg. 3-24). Moreover, Massport has selected an Airport Reference Code (ARC) of C-III, which would allow use of the runway by larger jet aircraft such as the Airbus, Boeing 727 and 737, and MDC DC-9 series. In addition, the Runway 32 NAYARDS is to consist of a localizer and glide slope for precision guidance, again serving larger aircraft. Thus it appears that Massport intends greater use of

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Runway 14/32 for larger jets than it has presented in the Draft EIS/EIR, having categorized the runway as essentially a commuter runway.

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Another issue is that of airfield capacity. Although according to Massport the maximum available capacity is 120 operations per hour (with a 3-runway configuration), this capacity is available only about 80% of the year. With Runway 14/32, actual capacity, and thus the number of operations, would increase to more closely approach 100% utilization. Furthermore, the inducement factor needs to be considered; a reduction in delay could result in an attraction for a greater number of flights at Logan. Correspondingly, under both of these conditions, there would result an increase in noise and air quality impacts.

CENTERFIELD TAXIWAY

The proposed Centerfield Taxiway would be a new 9,300 foot taxiway located between Runways 4L/22R and 4R/22L. This runway is designed to reduce taxiway congestion and to facilitate a more efficient movement of aircraft between terminal areas and runways during take off and landing procedures.

We have two major concerns with this proposal.

1. Safety Issues - Parallel runways 4L/22R and 4R/22L, which are among the most heavily-utilized runways at Logan,¹ are separated by only approximately 1,300 feet. The proposed Centerfield Taxiway would be located between these two runways, and much closer to 4L/22R than to 4R/22L. We seriously question the safety of proposing a taxiway between these two busy runways, which we believe could be a problem for a pilot who, on approach to either runway, is not familiar with Logan Airport or when there is extremely low visibility. Although the surface lighting would be different, there does exist the potential for a pilot to mistake the taxiway for a runway and to land an aircraft on the taxiway itself, rather than on a runway. (On at least one occasion recently, a pilot did land his aircraft on the wrong runway, rather than the assigned runway, because of the confusion of the two parallel runways.) With this potentially dangerous situation, we believe that implementing the Centerfield Taxiway could be a recipe for disaster, especially if there are airplanes waiting on the taxiway.
2. Environmental Issues - The addition of Centerfield Taxiway would provide an alternative route to Taxiway November to approach Runways 22L or 22R. Since neither the FAA nor Massport would agree to limit the number of aircraft which could use this taxiway, the number of aircraft which could approach this end of the airport would be very high, and would be added to

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¹ In 1997, 38% of all arrivals at Logan occurred on Runways 4L/R and 11% on Runways 22L/R; 37% of all departures occurred on Runways 22L/R.

those aircraft using Taxiway November. (Currently, at peak periods, the number of aircraft on Taxiway November enroute to runways 22L/R for departures usually total 10 to 15. Since Taxiway November is 3,800 feet in length, the number of aircraft requesting permission to use the Centerfield Taxiway, could nearly triple.) With a large number of aircraft using the Centerfield Taxiway, there obviously would be a substantial increase in noise, air pollution, and odor impacts on the Bayswater section of East Boston, which is located opposite the proposed alignment of this taxiway. These impacts especially would occur during the summer months, when southwesterly winds are the most common in Boston. Accordingly, we would seriously question Massport's claim of air quality and noise benefits of constructing the Centerfield Taxiway.

REDUCED MINIMA

This proposed operational improvement would reduce the approach minima of Runways 22L and 27 to ILS Category I values and on Runways 15R and 33L to Category III values, consistent with current industry standards at other major airports, to allow for greater use of these runways under certain unfavorable weather conditions. Reducing the minima would lower the decision height at which a pilot must make a decision to land or to execute a missed approach procedure at times when visibility is low.

For Runways 22L and 27, the proposed decision height would be lowered from the existing 420 feet and 460 feet respectively to 217 feet. For Runway 15R, the proposed decision height would be reduced from the current 268 feet to only 18 feet and for Runway 33L, from 217 feet to 17 feet. [We note that the figures in Appendix D showing the existing and proposed ILS minima (Figures 1-3) are very misleading, since the glide path angle is only 3.0 degrees, but the figures show an angle of approximately 40 degrees (due to the difference in vertical and horizontal scales), which leads to a distortion of the height an aircraft is over a particular neighborhood.]

With the exception of the proposal to lower the minimum for Runway 33L, the approach to which is over Boston Harbor,² we do have serious concerns with the other proposed reductions, especially in light of the minimal benefits achieved, and therefore we are opposed to this proposal. Our concerns relate to safety considerations, as well as increased noise impacts.

² In fact, the City of Boston originally proposed that Massport work with the FAA to consider installing a Category II or Category III landing system on Runway 33L, in order to offer some relief to residents of South Boston and Dorchester from excessive noise impacts during inclement weather. It also would increase the margin of safety to these neighborhoods by transferring some flights to an over-the-water approach.

1. Safety Considerations – For the most part, the approaches to these runways are located over heavily-populated residential neighborhoods. The approach end of Runway 15R is located approximately 3,000 feet from the Eagle Hill neighborhood and the Day Square section of East Boston, as well as over the Mobil Oil farm. For Runway 22L, the approach passes closely over homes located in the Orient Heights section of East Boston, some 30 of which are located in the Runway Protection Zone (an area designated by the FAA as one which should be clear of any structures, especially residential). The approach to Runway 27 is over the Port Shirley neighborhood of Winthrop. Reducing the visibility minima for these runways could have serious safety consequences for these residences. Since arrival is the most difficult and challenging portion of a flight, our safety concerns are based on the premise that the poor weather conditions and reduced visibility, which would trigger the use of these lower landing minima, would only serve to exacerbate a pilot's work load during the landing procedure. With the high number of residents living in close proximity to the touchdown points of these runways, we believe that lowering the safety standards would leave these residents in peril and could result in a tragedy at any time (especially with the reduced decision height of only 18 feet for Runway 15R).

2. Noise Impacts – We disagree with the assertion of Massport that lowering the landing minima would result in noise benefits for the residents living under the approach paths to the subject runways. At the present time, if visibility conditions are such that it becomes difficult for a pilot to see a particular runway, the FAA will close down that runway and assign a secondary runway, if available, or depending on the severity of the situation, close down the airport entirely until there is an improvement in weather conditions. Lowering the landing minima potentially could result in greater use of these runways during poor weather conditions, exposing nearby residents to greater noise levels and more frequent disturbances than they currently experience.

Aircraft operations during inclement weather tend to expose nearby residents to higher noise levels than under normal operating conditions. The reasons are two-fold. First, during severe weather conditions involving strong winds and rain, a pilot must apply a greater level of thrust to maintain stable flight, resulting in higher noise levels and thus increased adverse impacts for residents under the flight path. Secondly, since a low cloud cover usually is present under conditions which would trigger lower landing minima, noise levels from aircraft events would be amplified in intensity and would tend to last longer than on a clear day, further affecting residents under the approach path.

In addition, should it be necessary for a pilot to execute a missed approach procedure, the lowered decision points (as low as 17 feet) would require the pilot to apply a much greater level of thrust than at the current decision point

level in order to gain the necessary height to resume flight, resulting in much higher noise levels and further exacerbating the adverse impacts on nearby residents.

Therefore, based on the above considerations, we believe that lowering the landing minima will not serve to reduce the noise burden but rather will tend to increase the impacts that residents already have to endure.

However, even granting the possibility of some noise reduction, though slight (as described in Appendix D), we believe that the benefits are extremely minimal, especially when compared to the substantially increased safety concerns. Table 2 in Appendix D indicated an insignificant gain of only 8 hours in total airport runway availability with the proposed minima, and Table 3 indicates a reduction in average delay per operation of a mere 0.7 minutes. Table 3 also reveals an increase in total annual hours of dwell exceedence of 86 with implementation of the reduced minima, as well as an increase of total hours of persistence exceedence of 186, hardly an improvement in noise conditions for affected residents.

TAXIWAY IMPROVEMENTS

A number of taxiway improvements also are proposed to improve taxiway improvements, in order to reduce taxiway congestion, enhance airfield safety and facilitate operating efficiencies. These improvements include:

1. The reconfiguring of the Southwest Comer Taxiway System to streamline taxiway flow in a very complex area for ground operations and to improve access by isolating lines of traffic flow from each other;
2. The extension of Taxiway Delta to Runway 4R/22L by constructing an additional 2,000 feet of taxiway between Runway 33L and Runway 4R; and
3. The realignment of Taxiway November between Runway 15L/33R and Runway 33L/15R to eliminate an existing complex intersection and simplify the crossing of Taxiways Alpha and Kilo.

Since these improvements are designed to enhance airfield safety by eliminating confusing or problematic alignments and intersections, we support their implementation at this time.

PEAK PERIOD PRICING

The concept of "peak period pricing", originally proposed by Massport as an element of the Logan Airside Improvements Planning Project, has been rejected by Massport, in spite of its overwhelming support. Peak period pricing is designed to reduce delay by eliminating flights during periods when demand

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exceeds an airfield's capacity for a sustained period of time, and to induce a shift in aircraft operations to less congested hours of the day. Massport has eliminated this improvement based on a claim that airline over-scheduling is not currently a problem at Logan (although it was in 1993, which is used as the base year by Massport for modeling future delays) – again an example of the lack of consistency in the use of data by Massport to support its proposals) and is not projected to be a problem in the near future, in addition to projected economic impacts to certain regional airlines. We do not agree with these conclusions, particularly since the Draft EIS/EIR itself (page 4-2) acknowledges that under long-term High Fleet scenarios "peak period pricing could provide meaningful delay benefits by reducing airline over-scheduling that emerges as a contributor to Logan delays within these flights" (emphasis added).

We strongly support the concept of peak period pricing and believe it can be a key mitigation measure to reduce congestion, and thus delay, at Logan and that it can be a feasible alternative to new runway construction at the airport. This proposal, originally put forth by Massport itself in 1993,³ was projected to reduce peak hour activity by approximately 10%, producing a very substantial reduction in the expected amount of delay at the airfield (during the peak period, Massport estimated that a 5% reduction in the use of the airport would cause at least a 20% drop in average expected flight delays). According to the Massport report, this reduction in delay would be expected to come mainly from a reduction in commuter activity during peak hours, and especially from markets with ready commuting alternatives. Further, Massport estimated that 7% of the peak period weekday flights, representing only 3% peak period weekday seats, would be cancelled,⁴ with a smaller percentage rescheduled to non-peak hours. Thus Massport concluded that adopting of peak hour pricing would have minimal adverse impact but would benefit the passengers and airlines using Logan Airport during peak hours.

Peak period pricing also was endorsed by a National Jury convened at an August, 1994 conference (the Boston Conference-Shaping the Accessible Region) held in Boston to lay out priorities for transportation, economic development, and the environment in the metropolitan Boston region in the first decades of the 21st century. The Jury recommended that the Commonwealth adopt "congestion pricing"...to mitigate bottlenecks and delays at Logan that would impede the region's future economic growth" and further stated that it believed "that this approach offers a relatively inexpensive and flexible demand

³ Massachusetts Port Authority "Peak Hour Pricing at Logan Airport", April, 1993

⁴ Massport, "Logan Airport Peak Hour Pricing Plan-Briefing to DOT and FAA," June 9, 1993

management strategy, prolonging the use of Logan as its present location without requiring controversial runway expansion.⁵

We further note that the U.S. Environmental Protection Agency, in its comment letter on the proposed scope for the Draft EIS/EIR, (Volume II, Letter 1, pp. 2-3) strongly supported the concept of peak period pricing and recommended that Massport and the FAA institute such a pricing policy at Logan, noting that it had been applied effectively in the utility and telephone industries to mitigate the effects of peak period volume and to roads to alleviate congestion, with resulting environmental and economic benefits.

Massport claims, based on case studies included in the Draft EIS/EIR (Appendices F and G), that institution of peak period pricing would result in serious economic impacts on smaller regional airlines, such as Cape Air, which serve Cape Cod and the Islands. However, we seriously question the analyses and conclusions of substantial flight reductions. According to data presented in the studies, the projected cost increases would range from approximately \$4.50 to approximately \$13.00, which are hardly substantial increases and most likely would be recovered, at least partially, in the form of slightly higher fares. At the same time, the analyses lack some vital information by which Massport's conclusions can be evaluated. The studies do not indicate the current fares from the several originations. Therefore, we cannot determine the percentage of an existing fare that a potential increase would involve and whether it would be minimal, and thus well within a customer's ability to absorb, or not. Further, the studies do not indicate alternative costs to flying from these locations, such the cost of a ferry and automobile trip from the Islands to Boston, by which one could compare the costs of air transportation. Nor is there any analysis of the potential to use other airports, such as T.F. Green near Providence, to reach one's destination. Thus without sufficient comparative information, we cannot concur with the economic analysis presented by Massport.

In addition, we note that, according to the Summary of LAIPP DELAYSIM results table in Appendix H, Massport's selected Alternative 1A (all actions except peak period pricing) would result in considerable more hours of delay, particularly for the 2010 37M and 2010 45M High projections, than Alternative 1 (all actions), clearly indicating the significant delay reduction potential of peak period pricing.

In conclusion, therefore, we strongly believe that Massport should institute a program of peak period pricing at Logan, at least on an interim basis, to determine its actual effect on reducing delay before deciding to proceed with the more controversial, and questionable, runway or taxiway expansion proposals and reduced minima, all of which we feel require further study.

⁵ Harvey B. Gauth, *et al*, "The Boston Conference: Final Report - National Jury Recommendations, August 24, 1994, page 5.

ADDITIONAL POINTS FOR CONSIDERATION

1. Page 5-34 (top paragraph) – One could question the use of modelled runway use rather than actual effective runway usage in the noise analysis; does this not distort the analysis? 37.135
2. Page 5-61 – Construction of the Centerfield Taxiway will displace the nesting sites of the upland sandpiper, a State-listed endangered species. The Massport mitigation plan proposes to relocate these birds off-site to Cape Cod. One could question whether a more local site would be more appropriate. 37.136
3. Page 6-43 (Tables 6.2-14 and 6.2-15) – The differences between alternatives are not significant or are imperceptible. (Similarly with Tables 6.2-22 to 6.2-29) 37.137
4. Page 6.81-6-83 (Tables 6.3-10-6.3-14) – The air quality differences among the alternatives is not significant. 37.138
5. Page 6-100 (Table 6.6-1) – There are errors in the mean for arsenic, chromium, and lead (see Table 5.6-2, page 5-74). 37.139
6. Page 6-117 (Nighttime construction) – Nighttime construction is scheduled for Runway 14/32, the Centerfield Taxiway, Taxiway November, and possibly elsewhere. The impact on the adjacent East Boston community (Jeffries Point, etc.) needs to be addressed (should construction proceed). 37.140
7. Page 123 – Barging, rather trucking, should be considered for the removal of earth from the airport (also, barging in soil and construction materials) to reduce construction vehicle traffic. 37.141
8. Page 8.5 (Figure 8.2.1) – This figure is incorrect (actually it is the same as Figure 8.2-2). 37.142

October 13, 1998

Trudy Cox. Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attention: Arthur Pugsley - MEPA Unit

Re: EOE A #3247/5146 - Boston Logan International Airport
1997 Annual Update

Dear Secretary Cox:

The City of Boston Environment Department has reviewed the above referenced 1997 Annual Update (Update) and hereby submits the following comments.

The Update prepared for the Massachusetts Port Authority (Massport) indicates that Logan International Airport served 25.6 million passengers in 1997, a 1.7 percent increase over 1996. Domestic passenger activity increased by 1.2 percent, international passengers by 4.7 percent, general aviation passengers by 18.1 percent, aircraft operations by 5.8 percent and air cargo volume by 7.1 percent. General aviation (unscheduled) flights increased by 12.7 percent. Such flights are generally executive transportation and delivery of medical and financial products. The airport was the 11th busiest in the United States and the world ranked by number of aircraft operations.

This department has compiled, and attached to this letter, a set of guidelines for both the construction and operating periods of projects. These guidelines are designed to protect the environmental health of those who live and work in Boston in both the short and long term. We ask that Massport follow these guidelines and include them in the Guide to Tenant Construction referenced in previous environmental filings. This tenant guide should be reproduced in the next Generic Environmental Impact Report (GEIR).

Air Quality

Massport has clearly taken seriously the benefits of alternative fuels in equipping its shuttle bus fleet. The Update also notes, as did the 1996 document, that incentives are offered for private fleet and airside service vehicle owners who use alternative fueled vehicles (AFVs). How many of these owners have taken advantage of the incentives and what percentage of the total do they constitute? Is the 25 percent discount a sufficient incentive? Would a greater discount or free curb access for AFVs significantly increase their use without severely impacting Massport's revenues?

Bio-diesel is identified in Table ES-5 as a "clean" fuel. However, this designation is still very much in dispute. We recognize that some experts consider it a transitional technology to cleaner operations. However, CNG and other alternative fuel technologies are well established, bringing

into question the need for a transitional technology. For this reason, we are concerned about the expenditure of substantial funds to purchase AITC Red Route vehicles that use bio-diesel.

We encourage Massport to seize this opportunity to fully and aggressively promote truly clean vehicles.

While Stage 3 aircraft are more fuel efficient and provide some decrease in noise levels over Stage 2 aircraft, they increase NOx emissions. We concur with the Boston Transportation Department (BTD) that it is important that Massport and the Federal Aviation Administration (FAA) make the aircraft industry aware of the pressure to produce quiet engines that do not increase pollutant emissions. In addition, as Ground Service Equipment (GSE) is projected to be the future source of most CO increases, Massport and the FAA must work with manufacturers of such equipment to improve rates of emission.

As this and other City departments have stated in prior letters, we strongly support a consolidated car rental facility at Logan. We also restate our concern that Massport continues to examine the possibility of moving bus servicing and other operations to off-airport locations. As the air quality implications are potentially significant, this issue must be discussed with the community. In addition, information must be provided to the community and reviewers regarding the number of vehicle trips this would add to current levels and the potential new uses for space now occupied for car rental and bus servicing.

We thank Massport for posting "no idling" signs at the bus/limo and taxi pool areas. Once again, we ask that permanent signs be posted at all service areas, loading docks, and other areas where vehicles are likely to idle advising vehicle drivers of the law and Massport's expectation of compliance.

We question Massport's statement that "PM_{2.5} data for aircraft do not exist at this time." This is surprising since aircraft engines have undergone emissions testing for many years. We request that the GEIR contain a comprehensive literature search on this issue.

Energy/Resource Conservation Recycling

We are concerned about the estimated volume of fuel released during spills in 1997 as the amount spilled in 1996 was reported to be the result of lack of attention by a fuel provider and customer allowing for the leakage of a very substantial amount of fuel. Massport first notes in this Update that the number of fuel spills is down. However, it is then explained that the volume spilled has increased but that regardless of the amount spilled, it was less than the average annual volume spilled since 1990. When annual volumes are averaged and they include the 18,000 gallons spilled in 1995, the overall average number of gallons spilled for the last eight years is skewed and the analysis makes individual yearly spills pale in comparison.

-- It would appear that airport tenants require continuing education on spill prevention and that Massport must monitor this issue more closely.

There is currently limited recycling at Logan and we encourage its expansion to include glass containers, metal containers, cardboard, newsprint, white paper, milk cartons, juice boxes and plastic containers designated from 1 to 7. Increased recycling rates are likely to be required in the future in order to slow the demand for additional landfill space and incineration facilities both in and outside the Commonwealth. Massport should consider the long term in this area, particularly when facilities are being renovated or replaced. Light ballast recycling can easily be added to Logan's current program. We refer Massport to the enclosed guidelines for information on WasteCap of Massachusetts and the Recycling Service Directory and Markets Guide for Massachusetts.

We thank Massport for recycling water used during fire fighting training activities.

Again, we request that future GEIRs and Annual Updates contain distinct sections devoted to the issues of energy/resource conservation and recycling.

Ground Transportation

We congratulate Massport on the success of the Logan Express high occupancy vehicle (HOV) service for passengers and employees (a 29 percent employee increase) and we expressed our support for the Woburn Regional Transportation Center in our comments on the recent draft Transportation Implementation Plan (TIP). The Update indicates that the South Station bus dock dedicated to trips to Logan was a success but ridership numbers were not provided. This should be fully reported in the GEIR.

In 1997, scheduled and non-scheduled HOV ridership reportedly increased by 6.8 and 7.0 percent respectively above 1996 levels. While we are pleased to see HOV increases, we question as we did in response to the 1996 Update how single party transportation by an unscheduled commercial provider is considered an HOV service. A means of transit should not be considered high occupancy unless there are three or more air passengers in the vehicle. A private, on-demand service that transports one passenger to Logan is not an HOV, but functions as does a taxi. Again, future air passenger surveys, information asked of registered providers and Transportation Services Unit statistics should distinguish between the use of vehicles containing less than three air passengers and those containing three or more air passengers (true HOVs). Current and projected mode share statistics should then be modified as necessary to reflect the difference.

On a related matter, from a regional transit and air quality perspective, shuttling about 2,000 employees to the airport who have driven to a parking lot in Chelsea in single occupant vehicles should not be included in HOV numbers. It is specious to suggest that a one mile ride in a shuttle van or bus from the parking lot to the airport constitutes HOV commuting. Such a perspective could conceivably allow for reports of increased employee HOV use while the 7,100 on-airport employee

spaces and a substantial increase in employee parking in areas surrounding the airport would allow for ample, unconstrained single occupant vehicle (SOV) commuting.

We have not asked for an increase in the HOV mode share goal of 35.2 percent at 37.5 million passengers but it is tempting when we see both passenger and employee trips counted under the HOV category that truly do not meet the criteria for such a designation. This would certainly seem to work against the goals of the Transportation Management Association (TMA). Ridership levels should distinguish between employees who utilize an HOV for only part of their trip to work and those who use an HOV for the entire commute. A distinction must also be made between carpools and drop-off/pick-ups.

Once again, use of the Massachusetts Bay Transportation Authority's (MBTA) Blue Line by air passengers is down. We believe that this number can be increased through education and marketing to air passengers. Unfortunately, Massport and the MBTA have been discussing the trial installation of a token machine in Terminal C for more than two years now. The GEIR should contain a detailed explanation as to why this subject has not moved beyond the discussion stage. As we have said before, token machines should be available in a highly visible location at every terminal along with subway maps and bus and subway schedule information. We suggest that Massport consider locating token machines and informational displays at shuttle bus stops.

The Update indicates that TMA membership is now 20% of all airport employees and that one TMA member is offering subsidized MBTA passes. How many employees are TMA members? How many employees receive a T pass subsidy? Why does the TMA estimate that a reduction of only 250 to 300 employee commuter vehicle trips may be a result of Transportation Demand Management (TDM) measures?

We are concerned that Massport is sending some mixed messages to air passengers about travel to Logan. Recent radio advertising stressed the number of parking spaces available with the garage opening but did not also note that there are many other ways to reach Logan. Also, a local newspaper and the Wall Street Journal reported several months ago Massport's plan to provide automobile repair and detailing services to air passengers who drive to the airport. This would seem to indicate a disconnect in planning on some level.

Laurence G. Hanscom Field and Regional Airports

Why is there no air cargo service to and from Hanscom Field? While the Update mentions developing a plan that satisfies the needs of Hanscom, there is no discussion of Boston's need for the use of Hanscom. And, again, Massport makes no effort to address the issue of offering incentives to airlines to operate scheduled passenger flights at Hanscom.

We agree with the suggestion of the BTG that cargo flight distribution be examined from a regional perspective in order to ease the burden on Logan.

Health

The issue of Logan and health related impacts continues to be a prevailing concern of this department and inhabitants of neighborhoods adjacent to and affected by Logan. Residents continue to question the potential tie between individual and cumulative airport impacts and cancer, respiratory illness, hearing damage, headaches, emotional distress, neurological complaints, violence and stress-related disorders. We once again ask for a literature search to be reported in the next GEIR.

Land Use

The design of landscaping for the relocated Park n Fly should provide an effective visual buffer for the community. Replacement sites for the gas station, ground service equipment facility, hanger support facility and cargo facility should be chosen so that they shield the community, reduce existing impacts and create no new impacts.

Noise

While the 1997 cumulative noise index fell by .3 EPNdB, the population within L_{50} contours greater than or equal to 65dBA grew by 5,995, a 29 percent increase. Increased noise levels were experienced in East Boston and South Boston and calls to the Noise Complaint Line rose by 16 percent, from 3,913 in 1996 to 4,663 in 1997. This expansion of noise contours is disturbing and, it would appear, is partially the result of continuing problems with Runway 27 and the lack of success in reaching Preferential Runway Advisory System (PRAS) goals. We believe that actual operations of Stage 2 aircraft between 11:00 p.m. and 7:00 a.m. (due to unscheduled delays and necessary equipment substitution) may have contributed to this increase. However, despite prior requests, we have not succeeded in getting Massport to provide data on the number of Stage 2 aircraft arriving or departing annually between 11:00 p.m. and 7:00 a.m. We have also been unable to determine how often nighttime runway restrictions and late-night over-water flight operations were actually accomplished in a given year. We understand from the Update that NOMS data, referenced at 3.20 in Responses to Comments, will provide such information. This should be fully reported in the GEIR, providing information about actual, rather than scheduled, flights.

Please note that, given the increased noise contours and decisions to guide flight paths over urban open and recreational space, this department considers the increased use of Hanscom Field part of a comprehensive effort to equitably distribute noise (page 5-35).

How does the designation of the Harbor Islands National Recreation Area change the way Massport will analyze noise impacts? There will be increased use of the islands for camping and other recreational activities that will be adversely affected by overflights.

This department supports Massport's initiation of a study of the Hill Effect. We hope that this study will help to change the requirement that a resident must experience a flyover for soundproofing eligibility. The existing criteria leave many Boston residents subject to oppressive noise without mitigation.

We encourage Massport to advocate that the FAA include low frequency noise in its criteria for residential mitigation.

Southwest Service Area

East Boston residents do not agree with Massport's assertion that most users of the Maverick Gate are actually East Boston residents with a sticker. This remains an issue. Again, we ask that signage be installed to warn non-authorized vehicles that they will not find an exit on this route.

Please note that a hotel has been proposed for an area very close to this part of Logan. The potential impacts on hotel guests must be considered as development planning for the SWSA continue.

Water Quality

Staff of the Boston Conservation Commission (BCC) find that Massport rates its NPDES compliance with statements that are somewhat confusing and misleading. Descriptions such as "near full" to quantify the level of compliance is not specific or helpful. The GEIR should contain precise language that provides clear compliance information.

Massport plans to connect the Porter Street Drainage Area to the West Outfall during period of low flow. The existing treatment at Porter Street is already in complete compliance with NPDES levels for oil, grease and pH. What is the rationale for connecting Porter Street to this outfall? Won't the facility be overburdened by additional flow? We suggest that Massport use funds designated for the Porter Street connection be used to bring the West and North outfalls into complete compliance.

The Update notes that Massport audits its own and tenant facilities periodically for environmental compliance. Does this auditing involve enforcement and penalties?

We hope that Massport will find it appropriate to help educate the public and further improve the water quality of Boston Harbor by permanently installing at all storm drains plaques that bear the warning "Don't Dump - Drains to Boston Harbor." The enclosed guidelines contain information on obtaining these plaques.

Thank you for the opportunity to offer comment.

Sincerely,

Patricia A. Malone
Acting Director

Andrea d'Amato
Chief of Environmental Services

Enc.

November 24, 1997

Trudy Coxé, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attention: Arthur Pugsley - MEPA Unit

Re: EOE A #3247/5146 - Boston Logan International Airport
1996 Annual Update

Dear Secretary Coxé:

The City of Boston Environment Department has reviewed the above referenced 1996 Annual Update (Update) and hereby submits the following comments.

Air Quality

We support Massport's efforts to provide an incentive to tenants to use alternative-fueled vehicles.

We restate our concern that Massport continues to examine the possibility of moving bus servicing and other operations to off-airport locations. This issue must be discussed with the community and information provided to the community and reviewers regarding the number of vehicle trips this would add to current levels.

We continue to understand from East Boston residents that vehicles waiting in the taxi pool do not comply with MGL C. 90, Section 16A and 310 CMR 7.11, laws that prohibit vehicles in Massachusetts from idling for more than five (5) minutes unless the engine is required to operate lifts or refrigeration units. Massport indicates in response to our comment coded 4.4 that the problem of taxicab drivers trying to stay warm in their idling vehicles has been addressed. How?

Again, we ask that permanent signs be posted at all service areas, loading docks, the Bus/Limo Pool and other areas where vehicles are likely to idle advising vehicle drivers of the law and Massport's expectation of compliance.

Airside Improvements

While we understand Massport's position that the airside improvements project soon to be filed with MEPA is necessary to reduce delay, increase efficiency and improve airfield safety. We fail to understand why Massport continually refuses to disclose the passenger and operations capacity that would be possible at Logan if the Airside Improvements project was to proceed. This should be a detailed component of environmental filings on the proposal. We reserve further comment until we have had an opportunity to review the proposal in detail.

Community Response

Has the nature of the noise and odor complaint line changed so that a response to noise complaints, such as those from nighttime construction, are not addressed until the next business day?

Energy and Resource Conservation. Waste Reduction and Recycling

Again, this department requests that Massport and its tenants plan, design and operate new and improved facilities consistent with the concept of "sustainability." Building design should maximize the use of natural light, interior lighting systems should respond to fluctuations in ambient light and the potential for use of passive solar energy for heat and light should be evaluated for each new or renovated structure. Energy efficient heating and HVAC systems should be installed, regardless of who is paying the utility bill, and plumbing fixtures should include low-flow toilets and faucets with water conserving aerators. Some rooftop air conditioning units with electric cooling and gas-fired heating are equipped for hot air bypass for reheat of supply air, have dual path systems for separate conditioning of outdoor and return air streams and utilize outdoor air for cooling under suitable ambient conditions. The Federal Environmental Protection Agency's (EPA) "Green Lights" and "Energy Star" programs can provide additional information on environmentally sustainable and economically profitable measures. The address for these programs is 401 M Street, SW, Washington, DC 20460. The Energy Star fax line system can be reached at 202-233-9659 and the Green Lights/Energy Star Hotline is available at 1-888-782-7937 (fax 202-775-6680). A free subscription to the Green Lights & Energy Star Buildings Update can be ordered through the toll-free hotline number. Related Websites are: <http://www.epa.gov/greenlights.html> and <http://www.epa.gov/appdstar/buildings/>. We suggest that Massport use the EPA as a resource for itself and tenants.

We encourage Massport to provide close oversight on these issues, provide substantial direction to tenants and require as a standard part of construction contracts that contractors recycle or reuse, on-site or off-site, construction debris to the maximum extent possible. Some material not appropriate for reuse may be suitable for donation to The Building Materials Resource Center (100 Terrace Street, Roxbury, 02120, 617-442-8197). The Guide to Tenant Construction should include specific requirements for conservation and sustainability as well as sections regarding construction worker transit, approved truck routes and sanctions for route violations. In addition, Massport should consider the development of incentives for tenants to use environmentally sustainable practices.

Again, we request that future GEIRs and Annual Updates contain distinct sections devoted to the issues of energy and resource conservation, waste reduction and recycling.

Ground Transportation

The Update notes numerous times Massport's conclusion that non-airport related traffic using the Ted Williams Tunnel is responsible for the increase in Average Weekday Traffic (AWDT) and Vehicle Miles Traveled (VMT). While we understand that increased use of the tunnel may be a contributing factor, we believe that the Update understates the relationship of 'First Hour Free' parking, a policy in effect during eight months in 1996.

While the Logan Express high occupancy vehicle (HOV) service for passengers and employees has been a particular success, the same cannot be said for air passenger use of the

Massachusetts Bay Transportation Authority's (MBTA) Blue Line. As we have said before, token machines should be available in a highly visible location at every terminal along with subway maps and bus and subway schedule information. Massport continues to reply that there will be a trial installation of a token machine at Terminal C. This trial was mentioned in the 1994-95 Generic Environmental Impact Report (GEIR) (filed by Massport in July 1996) and was reportedly held up as a result of damage to token machines from the October 1996 flooding. Thirteen (13) months later a token machine is still not installed at Terminal C and 1996 activity in this regard is listed as "planning" for installation. When will this extended planning result in the actual installation of a token machine?

The Update indicates that there are presently 700 registered private bus, van and limousine operators providing private High Occupancy Vehicle (HOV) transit to the airport from areas underserved by convenient HOV services. It is estimated that these services may reduce trips to Logan by 4,500-5,000. No distinction is made between scheduled and unscheduled service. On page 5-36 single party transportation by an unscheduled commercial provider is considered an HOV service. We disagree. A means of transit should not be considered high occupancy unless there are three or more air passengers in the vehicle. A private, on-demand service that transports Logan one passenger to Logan is not an HOV. Future air passenger surveys, information asked of registered providers and Transportation Services Unit statistics should distinguish between the use of vehicles containing less than three air passengers and those containing three or more air passengers (true HOVs). Current and projected mode share statistics should then be modified as necessary to reflect the difference.

We are not convinced, as stated on page 5-39, that "Massport will not be in a position to revisit its passenger HOV mode share until well into the next decade when the airport and its access systems have stabilized."

We continue to support the consolidation of rental car services into one on-airport facility.

From a regional transit and air quality perspective, shuttling to the airport employees who have driven to parking lots from Chelsea and Revere in single occupant vehicles should not count as HOV use. Ridership levels should distinguish between employees who utilize an HOV for only part of their trip to work and those who use an HOV for the entire commute. A distinction must also be made between carpoolers and drop-off/pick-ups (see the "Other" category under HOV/Alternative Modes in Table 5-20, Employee HOV Mode Share).

Health

This issue continues to be a prevailing concern of inhabitants of neighborhoods adjacent to Logan. Residents have questioned the potential tie between individual and cumulative airport impacts and cancer, respiratory illness, hearing damage, headaches, emotional distress, neurological complaints, violence and stress-related disorders. We again encourage Massport to make a commitment to not only work with residents and local and state health agencies to develop a scope and procedure for study but to fund the chosen process. We believe that a good start would be a literature search to be reported in the next Annual Update.

Noise

The Annual Update provides no explanation for the problems in effectively implementing the Runway 27 jet departure procedures. Also, PRAS statistics show an uneven record and a substantial gap between goals and actual runway use.

References to the Noise Complaint Line fail to speak to nighttime construction noise complaints and how they are handled. Are they simply recorded, to be dealt with on the next business day?

How does Massport determine the level of compliance with the reduced engine idling recommendation?

Unfortunately, because a flyover is required for resident eligibility for soundproofing, many Boston residents are subject to oppressive noise without mitigation. In spite of Massport's noise rules for Logan, Stage 2 aircraft sometime land and take off between 11:00 PM and 7:00 AM due to unscheduled delays or the necessary substitution of equipment. In order to accurately and completely document the noise impacts of airport operations, the FAA flight strips collected from controllers each day should be used to determine the actual, rather than scheduled, number of nighttime flights into and out of the airport and the type of engine employed in each aircraft. This information should be provided in each Annual Update and GEIR.

Please note that we are concerned that noise impacts will increase if lower ceilings/visibility minimums are established.

Terminal A should be designed to shield the Jeffries Point neighborhood from noise impacts.

Regional Planning and Use of Regional Airports

Table 4-8 contains a list of Regional Planning Studies and implications of those studies for Logan. We find that the chosen implications for two of the cited studies do not fully represent the conclusions of the SMA and SAR that would affect Logan. The Second Major Airport Siting Study (SMA) was undertaken because the 1989 Massachusetts Airport System Plan (MASP) had concluded that even with operational and capacity improvements at Logan there would be a need for a second major airport by 2010. The SMA did not contain a specific recommendation about the type of airport necessary (international, short-haul or long-haul domestic). The Strategic Assessment Report (SAR) was based upon baseline assumptions that were different from the 1989 MASP and SMA, mainly regarding the future roles of communications and travel technologies. As stated in the document itself, the SAR was not meant to be a policy document nor was it designed to recommend a specific course of action. It did, however, conclude that the only necessary airport option, based upon projected demand, would be a large regional/reliever airport (LRRRA). The SAR concluded that, given the many uncertainties in forecasting demand and mode type, a conservative risk posture would call for the landbanking of a potential site. Clearly the major discrepancies in these two planning documents must be reconciled. The lack of full accounting of implications and the noted discrepancies cause us concern about the usefulness of the *New England Regional Airports Passenger Service Study*.

Why have no regular carriers had success in serving Hanscom? The reasons for this lack of success should be outlined in the next Annual Update.

Water Quality

We hope that Massport will find it appropriate to help educate the public and further improve the water quality of Boston Harbor by permanently installing at all storm drains plaques that bear the warning "Don't Dump - Drains to Boston Harbor." This would be a very modest expense for Massport.

We request that, in the next Annual Update, Massport thoroughly compare the effects of potassium acetate and other deicing compounds that are more sensitive to the marine ecosystem than glycols.

It is encouraging to see Massport's attention to the large salt marsh system at Wood Island Bay. Currently, this major ecological resource has no official protection. Over the past several years, this department has advocated that Wood Island Bay Marsh be formally designated a conservation area. The next Annual Update should include a detailed discussion of why a conservation restriction is a threat to safety and security.

Clearly, a lack of attention by a fuel provider and customer allowed for the leakage of a very substantial amount of fuel. While this will not be a problem once the Jet Fuel Distribution project begins operating in 1999, we believe that a mechanism for the detection of fuel leaks must be implemented immediately. It would seem that the fuel customer should have noticed a vast discrepancy between the amount of fuel for which they were billed and the amount actually used for operations. We request that Massport require that tenants adhere to a method of analysis that will detect a leak before it reaches the proportions reported in the Update.

Are all tenants co-signatories on Massport's NPDES permit?

Southwest Service Area

Airport Road (also known as Venice Street) is the sole access for traffic to the taxi pool and for trucks delivering automobiles to car rental agencies. This route abuts a residential area and the residents have noted the increased traffic, noise and odor. Signage should be installed to warn non-authorized vehicles that they will not find an exit on this route.

On a related topic, the Update includes only a brief reference to the Airport Edge Buffer Program. Is the Venice Street area included in this program? If not, Massport should begin a process with the community to identify an appropriate barrier or other mechanism to mitigate the effects of this trouble. We suggest that the redesign of this area take the needs of residents into account and locate access in egress in a place that does not cause such impacts.

Thank you for the opportunity to offer comment.

Sincerely,

Lorraine M. Downey
Director

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September 24, 1996

Trudy Cox, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202
Attention: Arthur Pugsley - MEPA Unit

Re: EOE A #3247/5146 - Boston Logan International Airport
Generic Environmental Impact Report

Dear Secretary Cox:

The City of Boston Environment Department has reviewed the above referenced Generic Environmental Impact Report (GEIR) and hereby submits the following comments.

Massport has requested that the GEIRs be filed every five years, rather than three, with Annual Updates to be filed by July 31 in years when a GEIR is not prepared. Massport did not file an Annual Update in 1994 and the 1995 Annual Update is a part of this GEIR. We oppose Massport's request at this time and believe that the three year schedule is appropriate given the history of filings and continuing work on the Central Artery/Tunnel and projects of Logan 2000.

Massport has also asked to be relieved of the requirement to file an ENF for new entrant airlines seeking to serve Logan, arguing that a GEIR and Annual Updates provide more meaningful data on overall operations. We do not agree and ask that this request be denied.

Air Quality

The GEIR indicates that while emissions of VOC and CO have decreased, (as has NO_x to a much lesser extent), these emissions are expected to rise in the future. With Stage 3 aircraft emitting significant amounts of NO_x and the projected increase in aircraft operations over time, this is a critical issue. Massport is to be commended for its program for conversion of its ground service vehicle fleet to alternative-fueled vehicles. Similar efforts by tenants must be strongly promoted by Massport. As an important step in mitigating the air quality impacts of Logan Airport, new lease agreements should include requirements or incentives, such as reduced curb fees for private fleet operators, for use of low or no emission vehicles by tenants. In addition, we believe that additional measures will be necessary and request that Massport investigate other

available technologies, particularly from Massachusetts-based companies, for reducing air emissions. Findings should be reported in the next Annual Update.

The GEIR indicates that Massport is evaluating the benefits of moving bus servicing and other operations to off-airport locations. The Annual Update should include a discussion of this issue, including the number of vehicle trips this would add to current levels.

It is our understanding from East Boston residents that vehicles waiting in the taxi pool do not comply with MGL C. 90, Section 16A and 310 CMR 7.11, laws that prohibit vehicles in Massachusetts from idling for more than five (5) minutes unless the engine is required to operate lifts or refrigeration units. Massport should report on the level of compliance in the next Annual Update and, if the current organization of the taxi pool does not promote such compliance, efforts to ensure adherence to the law be detailed. Permanent signs should be posted at all service areas, loading docks and other areas where vehicles are likely to idle advising vehicle drivers of the law and Massport's expectation of compliance. In addition, the next Annual Update should include an analysis of potential additional odor impacts on residences near the taxi pool when the Post Office is demolished.

The issue of particulate emissions (PM) and their relationship to public health was a subject of discussion at the MEPA Scoping Session on August 27, 1996. Because aircraft and ground vehicles emit PM, we request that Massport initiate a monitoring program for PM_{2.5} and PM₁₀ to determine baseline levels and the manner in which they are distributed.

Massport is currently a contributor to the on-going South Boston air quality study being conducted by the Harvard School of Public Health on behalf of the South Boston Community Health Center. The study is gathering important information on various sources of air contaminants including apportioning sources of PM₁₀ and PM_{2.5}. Funds for this study will soon run out and there is considerable value to the information being gathered. Massport, as well as other contributors, should continue to fund this monitoring program to build on the information gathered thus far.

The GEIR shows that a combination of ambient temperature, time of day, the type of aircraft operations, wind direction and runway use cause residents to file odor complaints with Massport. There is general agreement that such complaints are seriously under-reported by those affected. Community residents believe that there is a lack of widespread knowledge about how to file an odor complaint. Massport officials and their consultants note that there can be high levels of odor from very low concentrations of jet fuel. We recommend that Massport initiate a community education effort to inform residents of the way to file odor complaints. We also request that, with the Annual Update, Massport identify the ways in which odor impacts can be mitigated.

Airside Improvements

The GEIR contains minimal information on this consequential plan and it is noted that an Environmental Impact Report (EIR) will provide detail. At MEPA Scoping Sessions, public meetings and Massport-sponsored technical sessions it has been consistently stated that Runway 14/32, a center taxiway and lower minimums are necessary for efficiency at existing passenger and operations levels and are not geared toward expansion of the airport. There is no reference in

the GEIR to the capacity that might be possible at Logan should Massport's preferred changes be implemented. Due to this lack of detail, we request that you require the Airside Improvements EIR to include an analysis of the potential for these improvements to increase the number of passengers that could be served and the number of new operations that Logan would be capable of sustaining. The impacts of this capacity should then be detailed for: air quality, particularly for levels of CO and NO_x, PM_{2.5} and PM₁₀, and for odor and soot impacts; ground access and transportation, with potential HOV and public transportation mode shares, vehicle trip per passenger (VTPP) and vehicle miles traveled (VMT) expectations, anticipated employee transit characteristics and overall parking needs; noise, including the number of city residents living within the expected L_{dn} 60 dBA and L_{dn} 65 dBA contours and projected low frequency noise impacts; and water quality, especially related to projected fuel spills and deicing activities. The number of aircraft that could be queued on taxiways should be detailed.

Blast Fence

It is our understanding that Massport will be submitting an Environmental Notification Form (ENF) for removal of the blast fence across from the Orient Heights Yacht Club. There appear to be several significant issues surrounding this controversy and we begin by observing that the manner in which Massport informed the community of its intent to remove the fence has further reduced trust and may make community process on any project more contentious.

East Boston residents view the blast fence as a device that mitigates noise, fumes and blast effects from Runway 22R. Massport feels an obligation to take the fence down because it is frangible, and would therefore present a hazard to flight personnel and air passengers in the event of a crash. Residents feel that Massport is only concerned with the well being of airline and airport personnel and air passengers and that removal of the fence will negatively affect yacht club members, recreational users of Constitution Beach and those who live in Orient Heights. It is easy to appreciate each perspective. While we have no desire to compromise the safety of air passengers or flight and ground personnel, we also wish to ensure that members of the public are protected from noise, fumes and the jet blast that may present a hazard to boaters. We request that the alternatives analysis for the ENF include the results of a detailed investigation of a non-frangible barrier and other methods to ensure that the quality of life in and adjacent to Orient Heights is not further degraded.

Energy and Resource Conservation, Waste Reduction and Recycling

This department requests that Massport and its tenants plan, design and operate new and improved facilities consistent with the concept of "sustainability." Building design should maximize the use of natural light, interior lighting systems should respond to fluctuations in ambient light and the potential for use of passive solar energy for heat and light should be evaluated for each new or renovated structure. Energy efficient heating and HVAC systems should be installed, regardless of who is paying the utility bill, and plumbing fixtures should include low-flow toilets and faucets with water conserving aerators. Some rooftop air conditioning units with electric cooling and gas-fired heating are equipped for hot air bypass for reheat of supply air, have dual path systems for separate conditioning of outdoor and return air

streams and utilize outdoor air for cooling under suitable ambient conditions. The Federal EPA's "Green Lights" program is a good source of information on energy conservation.

When drafting plans for landscaping, vegetation should be chosen that does not require extensive irrigation so that there is minimal use of potable water for this purpose.

One of the goals outlined in the City's 1996 Environmental Blueprint is to promote reduction, reuse and recycling of wastes. Items accepted for recycling by most recyclers include glass containers, metal containers, cardboard, newspaper, white paper, milk cartons, juice boxes and plastic containers designated from 1 to 7 and they can be co-mingled. All airport facilities should include space for the separation of recyclable items from trash and for the storage and pick-up of items. We suggest that Massport talk with staff from the Department of Public Works Recycling Program to discuss how airport-wide recycling can be made efficient and effective.

We encourage Massport to provide close oversight on these issues, provide substantial direction to tenants and require as a standard part of construction contracts that contractors recycle or reuse, on-site or off-site, construction debris to the maximum extent possible. Some material not appropriate for reuse may be suitable for donation to The Building Materials Resource Center (100 Terrace Street, Roxbury, 02120, 617-442-8197). The Guide to Tenant Construction should include specific requirements for conservation and sustainability as well as sections regarding construction worker transit, approved truck routes and sanctions for route violations. In addition, Massport should consider the development of incentives for tenants to use environmentally sustainable practices.

In an on-going effort to support the clean-up of Boston Harbor, we request the permanent installation of plaques at storm drains that bear the warning "Don't Dump - Drains to Boston Harbor." Information on these plaques is available at the Boston Water and Sewer Commission.

We request that future GEIRs and Annual Updates contain distinct sections devoted to the issues of energy and resource conservation, waste reduction and recycling.

Ground Transportation

We congratulate Massport for its commitment to employee demand management, evidenced by work to initiate a Transportation Management Association (TMA) and an East Boston shuttle service. As we have commented before, it is this department's strong belief that construction employees, abundant in number, should be affiliated with the TMA and that such a requirement be part of Massport's contract with construction firms. We hope that the next Annual Update will detail the incentives to join the TMA that Massport offers to tenants. In addition, an explanation should be offered regarding the recent service reductions by the on-airport #44 shuttle.

The planned consolidation and relocation of auto rental facilities and locations for park and fly lots should be thoroughly analyzed for a various potential locations with a goal to reduce impacts on residents of surrounding communities. We ask that the Annual Update contain a complete discussion and evaluation.

Some preliminary data on the "First Hour Free" parking program, aimed at reducing both curb use and the number of vehicles circling airport roadways while waiting to pick up passengers, show an increase in vehicle trips to Logan. Both Massport and area residents have noted that there was increased curb use when the one hour parking rate was increased from \$4.00 to \$5.00 in January 1996. Massport must substantiate, when filing supplemental information, the

claim that free parking causes no increased traffic generation and reduces curbside congestion. We also request, given Massport's willingness to forgo some parking revenue, that the supplemental information include an evaluation of reinstituting a charge for first hour parking with those revenues dedicated to trip reduction, congestion mitigation and open space development and maintenance in East Boston. Existing commitments and the funding of mitigation for approved projects should not be affected by any new sources of mitigation revenue. This evaluation would require examination of a range of first hour pricing options and calculations of the revenue generation by each.

Recognizing that Massport is attempting to address both safety and environmental issues regarding parking, area residents suggested several options at the August 29, 1996 Technical Session. They included a barrier toll at the airport entrance, rescission of the taxi surcharge and a pricing policy that makes the first hour the most expensive. These and other alternatives should be evaluated in the next "First Hour Free" filing.

Should Massport receive approval to continue with the "First Hour Free" policy, it seems sensible that they must reevaluate parking analyses for airport projects, including the West Garage, that are based on a substantially different pricing schedule.

While the Logan Express high occupancy vehicle (HOV) service for passengers and employees has been a particular success, the same cannot be said for air passenger use of the Massachusetts Bay Transportation Authority's (MBTA) Blue Line or buses from the North Shore. To increase awareness of public transit options, token machines should be available in a highly visible location at every terminal along with subway maps and bus and subway schedule information. Travelers should also be able to purchase the MBTA's short-term visitor transit passes at the airport. When Blue Line trains are expanded from four to six cars, one car on each train should be equipped with baggage racks or platforms and the MBTA should advertise this accommodation. Some MBTA buses from the North Shore will make a detour for Logan passengers at their request but this is not widely known and it increases trip time for commuters to downtown. The MBTA should examine use of Wood Island Station as a transfer point with Massport providing shuttle service for both employees and air passengers. Shuttles from Maverick Station should also be considered.

Another option for deliberation, particularly if the People Mover project does not go forward, may be extension of the Blue Line through the airport to Gloucester on an existing right of way (ROW) near the water tanks on the north side. Escalators and elevators at MBTA stations serving the airport and downtown are particularly important for travelers with luggage and a dedicated effort should be made to ensure that they are operable or re-started as quickly after a shut-down as safety permits. An air passenger who finds that they must carry bags up a long stairway because the escalator is not functioning is unlikely to use this mode again if they have other choices. Turnstile configuration at the same stations should be designed with slide-throughs or other ways for the comfortable movement of suitcases, other luggage, carts, strollers and parcels. Providing flight information screens and areas for luggage storage at major downtown subway stations should be examined as a method for decreasing inconvenience for air passengers who also choose public transit.

This department recognizes that increasing air passenger use of public transit will have impacts for the MBTA. We encourage Massport and the MBTA to work closely together to resolve any issues that may prevent a coordinated effort to educate air travelers about the availability of our public transit system and then making it convenient for them to use that system.

On a more broad-based level, we believe that accommodating the region's expected number of air passengers in the coming years will require a joint effort by municipal and state agencies to identify and provide a range of convenient and efficient intermodal transportation alternatives to Logan that do not impact local communities. As an example, parking facilities convenient to the Massachusetts Turnpike, perhaps in conjunction with other development efforts, might allow for increased Logan Express or other park and ride services for air passengers. It would seem that a formal, distinct, collective enterprise by Massport, the MBTA, Massachusetts Highway Department (MHD), Massachusetts Turnpike Authority (MTA), Boston Transportation Department (BTD) and other agencies involved in transportation and economic development may be key to creating a variety of solutions. We ask that you take any steps necessary to encourage this type of a collaborative effort.

Health

This issue is clearly a prevailing concern of inhabitants of neighborhoods adjacent to Logan. Residents have questioned the potential tie between individual and cumulative airport impacts and cancer, respiratory illness, hearing damage, headaches, emotional distress, neurological complaints, violence and stress-related disorders. It appears, from information gleaned at the September 16, 1996 Technical Session, that available discharge data is not a reliable indicator of possible connections between an airport and illness. Clearly, a methodology for examining potential links must be identified so that a proper response can be formulated. While we understand that Massport is not a public health agency, we believe that it is appropriate for Massport to fund a study on this matter. We encourage Massport to make a commitment to not only work with residents and local and state health agencies to develop a scope and procedure for study but to fund the chosen process.

Noise

The number of Boston residents living in the L_{dn} 60 dBA and L_{dn} 65 dBA contours have increased despite the modest decrease in the Cumulative Noise Index (CNI). This clearly indicates that a more comprehensive mitigation program is necessary. The Annual Update should explain in detail why the collective use of Runway 15R/33L is not more frequent and how enhanced PRAS has or has not assisted in meeting PRAS goals.

Volume II (pages II-2-72/73) contains a discussion of reduced engine-taxi and concludes that there is a net reduction in cumulative noise when one or more aircraft engines are shut down during taxi operations. We request that this change be implemented as part of the overall noise abatement strategy.

The GEIR reports that the Low Frequency Noise Study showed that Massport's noise insulation program mitigates this impact. It is also noted that "the human perception threshold of

vibration is far below the vibration level needed to initiate surface cracking in structures." (Volume IV, Section 4.4.) There is however, no reference to the way in which vibration may affect the health and quality of life of residents exposed to his impact. This aspect of vibration must be examined.

Why were no wide-body aircraft included in the study when Massport is adding gates specifically designed to accommodate such airplanes? Given their absence, we question the validity and applicability of the conclusions and request that the low frequency noise effects of wide-bodied aircraft be studied. This is an issue that needs further investigation and Massport should continue research to identify any mitigation standards that have been set for this impact at other airports. Of particular concern for us are residents of neighborhoods like Jeffries Point who are not eligible for soundproofing but who are subject to considerable low frequency noise.

As staff from this department experienced on August 8, 1996 at a meeting at the Orient Heights Yacht Club, the noise level in the area is overwhelming. We understand from residents that the number of idling aircraft queued on the north taxiway contributes to the din. The Annual Update should include a discussion of ways to minimize the queue and resulting noise.

The GEIR indicates that Massport fields many telephone complaints annually and that information is forwarded to the Federal Aviation Administration (FAA). What appears to be missing from the description is the frequency and manner in which exceedance data is provided to the airlines. We recommend that such information be provided directly to each airline on a frequent, regular basis. The process for doing so should be specified in the Annual Update as should a clear reporting of exceedances, including single events.

Although directed to analyze the noise from helicopters flying to and from Logan, Massport has only reiterated information previously provided. The Annual Update should include an evaluation of the impacts of the described routes and the options for mitigation.

During a discussion of the Flight Track Monitoring Study at the September 20, 1996 Technical Session, community residents noted that low altitude operations are a nuisance and violate Massport's standards. The Annual Update should contain a method for factoring low altitude operations into flight track monitoring data.

Water Quality

Massport has demonstrated increasing attention to the impacts of airport operations on water quality in and around Logan. The support of best management practices and performance of environmental audits demonstrate a commitment to protection of ground and Harbor waters. This department is encouraged by the improved compliance with NPDES permits for oil, grease and pH (Tables II-5-7 and 5-8). Yet, stormwater runoff, deicing chemicals, and fuel spills continue to be potential sources of contamination for Boston Harbor and the ecologically important marshes that are a habitat for migrating water fowl and a breeding area for fish and fowl.

While recognizing the necessity of deicing for safe operations, we are concerned about its impacts. Although the compounds are not persistent in the environment, the GEIR does not provide information on the implications for the marine ecosystem due to short term and steady exposure. We recommend that Massport move away from the use of ethylene glycol and toward

the use of propylene glycol with a goal to ban the use of ethylene glycol at Logan within several years. If most of the glycol is used in a known location, i.e. on the aprons, planning efforts should be made to find a way to collect and dispose the used product before it enters the drainage system, collect and treat the fluid before release or to reuse collected glycol. This department requested in 1993 that Massport investigate the feasibility of installing catch basins/holding tanks for glycol in the apron areas and there has been no response. We request that, in the Annual Update, Massport respond to this request and thoroughly compare the effects of potassium acetate and other deicing compounds that are more sensitive to the marine ecosystem.

It is encouraging to see Massport's attention to the large salt marsh system at Wood Island Bay. Currently, this major ecological resource has no official protection. Over the past several years, this department has advocated that Wood Island Bay Marsh be formally designated a conservation area. The GEIR suggests that a formal designation is now feasible. The Boston Conservation Commission (BCC) requests that Massport initiate this process. The GEIR mentions planning for open space buffers. We applaud Massport's commitment to a community design process and request that plans for the East Boston Greenway be considered as part of the overall context. A boardwalk system through the marsh, for example, would connect pieces of the Greenway and provide opportunities for citizens to learn about the ecosystem. Massport has demonstrated an interest in education by allowing access to this area in the past for environmental education programs run by the Boston Natural Areas Fund (BNAF). We encourage continued efforts and offer our assistance in finding ways to open this major environmental resource to the public.

The GEIR contains numerous references to the limits of Massport's influence on changes in service, with the role of airport operators and transportation professionals described as subordinate to that of airlines. Notably missing from this description is the function of Massport's marketing staff in attracting new and expanded service. The representation is self-serving and understates the effect of policies and practices that may contribute to limited use of other airports. For example, Massport has imposed noise rules at Laurance G. Hanscom Field that effectively limits the size of aircraft flying to and from Bedford. In addition, there has been no investment in terminal space and passenger services and it is reasonable to conclude that Massport is acting to prevent this facility from being suitable and attractive for expanded service. This suggests to us that Massport is willing to inflict substantial impacts on urban residents but is unwilling to distribute some of those impacts to communities whose residents fly in and out of Logan. We believe that Boston residents have borne more than their share of airport-related difficulties and it is time they be shared.

In discussing the issue of expanded service at Logan or other facilities, including regional airports, the GEIR asserts that Logan Airport's location reinforces urban land use patterns and supports the economy and development in the downtown area (I-5-36). Growth and development of regional airports, it is suggested, will contribute to urban sprawl. Further, the reader is asked to consider that there is no such thing as an "impact-free choice" when trying to determine how to meet the need for increased air travel. Logan is identified as "uniquely well-

served in comparison to the regional airports by the highway, public transportation, and HOV services which help minimize the adverse environmental impacts of growth." Maximizing the use of regional airports is not thought to be necessarily "better" from an environmental perspective because of the potential for such consequences as increased traffic, poor levels of service at key intersections and possible secondary impacts to local street networks.

Residents of neighborhoods adjacent to Logan fully appreciate the impacts of a nearby airport. In fact, these neighborhoods today live with an overabundance of airport-related impacts. From our perspective, deliberations about the path to expanded air service must recognize this reality. Such a planning process must also resolve the major inconsistencies between the Massachusetts Aeronautics Commission (MAC) 1990 Second Major Airport Study (SMA) and the 1993 Strategic Assessment Report (SAR) regarding Logan's present capacity, future demand for air travel, the relative influence of telecommunications technologies and other travel modes on air travel demand and methods for ensuring continued, sufficient air service to the region. In any case, both studies acknowledge the need for service growth beyond Logan Airport. We note with concern that there has apparently been no action on recommendations from either the SMA or SAR.

While we recognize that Logan is expected to expand, it has reached the maximum level of local impact: that the City of Boston and surrounding neighborhoods are willing or able to accept. As such, other airports must be prepared to expand or Logan will have to curtail its growth.

Thank you for the opportunity to offer comment. We look forward to the next Annual Update.

Sincerely,

Lorraine M. Downey
Director



September 24, 1996

Peter L. Koff, Esq.
McGowan, Engel, Tucker, Garrett & Schultz
125 High Street
High Street Tower, Suite 2601
Boston, MA 02110

Dear Peter:

In accordance with our telephone conversation today regarding your public records request dated September 12, 1996, I have enclosed the "Agreement between The Federal Aviation Administration and The City of Boston and the Massachusetts Port Authority" (No. L-1950).

If after reading it you need additional documents, please call me at 973-5653.

Sincerely,

MASSACHUSETTS PORT AUTHORITY

Ira M. Wallach
Senior Legal Counsel

cc: S. Kaiker



AGREEMENT
between
THE FEDERAL AVIATION ADMINISTRATION
and
THE CITY OF BOSTON
and
THE MASSACHUSETTS PORT AUTHORITY

MPA Ref. No. L-1950

THIS AGREEMENT made as of this 31st day of July, 1980 between the FEDERAL AVIATION ADMINISTRATION (hereinafter, the "FAA"), an agency of the Department of Transportation of the United States of America, the CITY OF BOSTON (hereinafter, the "City"), a municipal corporation chartered by the Commonwealth of Massachusetts, and the MASSACHUSETTS PORT AUTHORITY (hereinafter, the "Authority"), a body politic and corporate organized and existing pursuant to Massachusetts St. 1956, c. 465 as amended:

WITNESSETH:

WHEREAS, FAA desires in conjunction with Authority to install certain navigational facilities on premises leased at Boston-Logan International Airport ("Airport") for the aid and assistance of aircraft preparing to land on Runway 15R at the Airport, which facilities are specifically:

1. A 1,400 foot-long Medium Intensity Approach Light System with Flashers, more commonly referred to as a MALS/F;

2. A 3,000 foot-long Touch Down Zone Lighting System (This system to be installed and operated by the Massachusetts Port Authority).
3. A relocation of the present Localizer System from an offset configuration to a centerline configuration which will be physically located on the Runway 33L pier but will serve Runway 15R.

WHEREAS, the City is concerned that features of the foregoing proposed installations may have the potential to raise significant environmental issues about increased noise annoyance for residents of the City living under the aircraft approach path to Runway 15R, particularly about increased aircraft arrival traffic on Runway 15R in periods of poor weather and at night.

WHEREAS, FAA, in a project notification form on the proposed installation prepared pursuant to Office of Management and Budget Circular A-95, has stated that FAA's intention is not to lower landing minimums on Runway 15R as a result of the proposed installations (a copy of the background information presented by FAA in support of the project notification is attached hereto as Exhibit A and incorporated by reference herein).

WHEREAS, the City has the right to oppose the proposed installations and so advise FAA and Authority, thereby having the potential for delaying or preventing their implementation.

NOW THEREFORE, for and in consideration of the premises and covenants, terms and condition hereinafter set forth, the City, the FAA and the Authority do hereby mutually agree as follows:

1. The City shall refrain from exercising its right to oppose the proposed installations.
2. FAA will not reduce the landing minimums for Runway 15R as a result of these installations from those existing prior thereto. Specifically, these minimums are a decision height of 268 ft. MSL and a visibility of 4,000 ft. as measured by the airport RVR system or three-quarters of a mile measured as the prevailing visibility.
3. If at any time in the future, for any reason, FAA desires to pursue lower landing minimums to Runway 15R not as a result of these installations, the FAA will be required to prepare a full environmental impact statement including public meetings if so desired by any community group or other interested party.
4. FAA agrees that the terms of this Agreement will be included in all leases associated with the navigational aids involved in these proposed installations, by inclusion of terms in said leases substantially as set forth as Exhibit B which is attached hereto and incorporated by reference herein.
5. Authority shall monitor the volume of landing traffic on Runway 15R in accordance with currently established runway use data collection procedures and will

report periodically to the City the changes, if any, in the volume of traffic on Runway 15R.

6. This Agreement may not be amended except in a writing duly signed by all parties.

7. This Agreement shall be deemed a Massachusetts contract to be governed by and construed under the laws of the Commonwealth.

IN WITNESS WHEREOF, the parties have caused counterpart originals of this Agreement to be executed by their duly authorized representatives as of the date first above written.

CITY OF BOSTON

By: [Signature]

Title: Asst. Corp. Counsel

Date: 8/5/80

Approved as
to Form: [Signature]
Ass't Corp. Counsel

FEDERAL AVIATION ADMINISTRATION

By: _____

Title: _____

Date: _____

Approved as
to Form: _____
Regional Counsel

MASSACHUSETTS PORT AUTHORITY

By: _____

Title: _____

Date: _____

Approved as
to Form: [Signature]
Chief Legal Counsel

BACKGROUND INFORMATION

RUNWAY 15 RIGHT PROJECT

EXHIBIT A



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Program Narrative

- I Background
- II Proposed Action
- III Other Concurrent Actions
- IV Benefits/Results Expected
- V Further Considerations of Proposed Actions
- VI Mitigating Actions
- VII Implementation Schedule
- VIII Project Cost

Exhibits

- 1. Airport Map Depicting Project Locus
- * 2. ~~Aerial Photo Depicting Proposed Improvements~~
- 3. Description of Instrument Landing System (ILS)
- 4. Pictorial Display of ILS
- 5. Description of Medium Intensity Approach Light System with Flashers (MALS/F)
- 6. Pictorial Display of MALS/F Lighting System
- 7. Description of Touchdown Zone Lighting System (TDZ)
- 8. Pictorial Display of TDZ Lighting System

* Exhibit 2 deleted. Will be available at public hearing

I. BACKGROUND

The FAA and MPA have been conducting studies of various facility modifications and improvements aimed at enhancing the overall airport environment at Logan International Airport. The thrust of these studies has been an attempt to achieve the best possible balance between community needs and concerns on the one hand, and improvements to the operational environment on the other. Both have considered the safety of people, both in the air and on the ground, as the primary factor, with no derogation of safety permitted. It was concluded that there were numerous actions that could be taken which would improve community, operational, and safety factors at Logan, some of which have already been implemented. Those actions pertaining to Runway 15R are considered of next highest priority and are the subject of this proposal.

The overall objective of this proposal is to improve the approach and landing environment to Runway 15R by enhancing the electronic precision and visual aids available to the pilot of landing aircraft. The intent is to achieve greater consistency in completion of the approach to touchdown, and to thereby greatly reduce the high incidence of missed approaches which have occurred on this runway in the past without the benefit of these improvements.

Landing approaches to Runway 15R under low visibility conditions have historically produced a far greater number of missed approaches than on any other runway. It is also the only runway approach where large numbers of consecutive missed approaches have occurred. The missed approach problem has subjected the residents under the final approach path to an unnecessary number of severe noise events.

In addition to the clear need to address the missed approach problem at its source, there is also a need for a continuing phased program to upgrade navigational aids available at Logan, and to provide approach lighting guidance for all air carrier landing runways. This proposal is one element of that program.

II. PROPOSED ACTIONS

The FAA, in conjunction with the Massachusetts Port Authority, proposes to improve the existing Runway 15R approach and landing environment at Logan Airport by taking the following specific actions:

1. Install a short medium intensity approach light system with sequenced flashers (MALSF) extending 1,400 feet toward the northwest from the displaced landing threshold. The MALSF system would be flush mounted in existing lighting cans previously installed in the displaced runway and blast pad pavement, and with new paved pads constructed in the grass overrun for installation of the last two light bars of the system. The nearest light bar to the airport property boundary would be 1,400 feet away. (See exhibits 2, 5, and 6 for location and further details.)
2. Install a touchdown zone lighting system extending from the displaced landing threshold toward the southeast for a distance of 3,000 feet. The lighting cans and conduit for this system were installed in the runway pavement several years ago. Activation of the system requires only the installation of the flush mounted lighting fixtures, installation of interconnecting cable, and certain lighting vault modifications. (See exhibits 2, 7, and 8 for location and further details.)
3. Relocate the present Localizer component of the instrument landing system (ILS) from its present offset position beside the runway to a centerline position on the approach light pier to Runway 33L. This relocation will require the construction of a new Localizer antenna platform on the pier, a new pile supported platform 250 feet to one side of the pier for the electronic equipment shelter, and a walkway connecting the two.
4. Relocate the present visual glide slope indicator (VASI) approximately 100 feet toward the southeast so that its visual glide slope is coincident with the existing electronic glide slope. (See exhibit 2.)

III. OTHER CONCURRENT ACTIONS

The Massachusetts Port Authority is also proposing other concurrent improvement and rehabilitation actions on airfield areas at Logan Airport this construction season which are the subject of a separate "Notice of Intent", filed by that agency under OMB Circular A-95 procedures on February 28, 1980.

IV. BENEFITS/RESULTS EXPECTED

The primary benefits of this proposal will be an enhancement of the runway environment which will produce a reduced potential for missed approaches, thereby eliminating the noise events produced under the path of those missed approaches, and an overall improvement in the precision, standardization, and margins of operational safety associated with landings on Runway 15R.

Specific benefits of the individual elements of the proposed program are as follows:

1. Installation of the MALSF approach light system and touch-down zone lighting will greatly enhance a pilot's ability to gain visual contact with the runway environment well before reaching the existing decision height of 268 feet, at which point a missed approach must be executed if that environment is not clearly established visually. This is the primary element which will insure that a landing can be completed rather than a missed approach being executed.
2. Centering of the Localizer will eliminate this non-standard aspect of the ILS approach and the last minute course correction required for alignment with the runway. The centering will also enhance a pilot's ability to complete a transition from instrument flight to visual contact with the runway environment before reaching decision height.
3. Relocation of the existing VASI will eliminate a non-standard condition resulting from the fact that it was installed by the Massachusetts Port Authority prior to the installation of the existing ILS system by the FAA. As a result, its projected glide slope for visual approaches is not coincident with the ILS glide slope. Relocation will make both glide slopes coincident and move the VASI touch-down point slightly more than 100 feet further from the community, raising the altitude of that glide slope by about 6 feet.

GENERATION OF PROPOSED ACTIONS

1. GENERATION OF INCREASED LANDING TRAFFIC

The proposed improvements to the Runway 15R approach and landing environment will not result in increased use of Runway 15R for landing. Assignment of runways for landing is made by the FAA in accordance with the preferential runway use system which gives Runway 15R the lowest landing priority. Other factors which must be considered in the assignment process include wind direction and velocity, runway surface condition, visibility and the capacity of the selected landing and takeoff runway combination to accommodate the anticipated volume of arriving and departing traffic without unacceptable delays. These runway assignment procedures will not change as a result of the actions proposed and have historically resulted in very low utilization of Runway 15R for landing. For five of the past six years, an average of only 4½ per cent of all landings have used Runway 15R. By comparison, if landings were assigned so as to equally distribute them between each of the five instrumented landing runways ends, the utilization of each would be 20 per cent. This serves to demonstrate the effectiveness of the preferential runway assignment practices employed by FAA in keeping the landing use of Runway 15R to a minimum. These practices will continue.

Since there will be no change in the landing utilization of Runway 15R as a result of the proposed actions, there can be no noise or air quality impacts thereby generated. The proposed actions are expected to greatly reduce if not eliminate missed approaches, and the additional landing attempts which usually occur after missed approaches have been executed.

2. LANDING MINIMUMS

The present landing minimums on Runway 15R will not be altered as a result of the actions proposed. Present landing minimums on Runway 15R are a decision height of 268 feet above sea level and a forward visibility of 4,000 feet, as measured by the Runway Visual Range (RVR) instrumentation in the touchdown area. These minimums will be retained upon completion of the proposed improvements.

3. LIGHTING EMISSIONS

a. MALS/F Approach Lighting System

Characteristics and location of the proposed MALS/F approach lighting system components are described in Exhibits 2, 5 and 6. and differ from the normal MALS/F installation in that the lighting fixtures are recessed flush in the pavement rather than being elevated on stems above ground level. The light beams of the recessed fixtures are aimed upward toward the approach area at an angle of 5° to the horizontal by passing through a prism in the slotted fixture top. This produces sharper horizontal and vertical cut off angles than the elevated fixtures with no greater light intensity.

Light levels along the extended path of the MALS/F system will be increased but only during those minimal periods when Runway 15R is in use for landings at night or under low visibility conditions. Since the light beams are aimed upwards to provide maximum brightness along the glide path and have a sharp vertical cut off angle, the increased illumination near the ground will be quite small. The illumination also falls off rapidly with distance and with increasing angles off the centerline.

In 1978, an environmental impact study of elevated MALS approach lighting systems was conducted by H. H. Aerospace Design Co. Inc. of Bedford, MA under contract to the FAA. This study produced a computer model capable of accurately estimating illuminance levels which would be produced at any point in the approach environment. Using this methodology, it has been calculated that worst case illuminance levels on Neptune Road would not exceed .05 foot candles. This value is compared to other common sources below:

Fluorescent Illumination in Kitchen	43.0	foot	candles
Incandescent Light Suitable for Reading	15.0	"	"
Beneath Mercury Vapor Street Lamp	1.3	"	"
21" Color TV at Distance of 10 Feet	.3	"	"
Full Moonlight	.02	"	"

The sequenced flashing lights were also evaluated in the study with respect to their contribution to illumination levels. The study concluded that "The flashing illumination from the strobes in a MALS/F system falls off more rapidly than the steady illumination as one moves out from the airport. As soon as one is more than 100' beyond the last flasher, the flickering light is less than the constant light."

In the case of Neptune Road, none of the direct illumination of MALS/F lights would be visible from ground level although in a few homes unshielded by trees or other buildings, they could be seen from upper story windows, as can other existing airport lighting. The fact that the direct illumination MALS/F lights would not be visible near ground level was confirmed last year when FAA installed a sample light bar at the station which would be nearest the community for demonstration purposes.

Sometime in April 1980 the new MALS/F system installed in the displaced runway pavement to Runway 22L should become operational. This will provide an opportunity to view an identical system from the Bayswater shoreline and from a distance closely approximating that which would exist between Neptune Road and the proposed Runway 15R MALS/F system.

b. Touchdown Zone Lighting System (TDZ)

The characteristics and location of the proposed TDZ lighting system are described in Exhibits 2, 7 and 8. Due to its distance from the nearest community, the light emissions of this system are not anticipated to produce any incremental impact over that associated with the MALS/F system.

4. LOCATION OF SECOND CATEGORY II SYSTEM

A Category II instrument landing system was proposed for installation on Runway 15R. This is no longer contemplated. If a second Category II system is designated for Logan International Airport, it will be installed on Runway 33L.

5. CONSTRUCTION IMPACT

From a construction impact standpoint, no significant construction related annoyances should be created. The only noise which should be discernable from construction operations would be that associated with pile driving over a two to three week period at the Runway 33L approach light pier. All other construction work should produce no adverse noise, air quality or water quality impacts whatever. Truck deliveries would be extremely limited, consisting primarily of electrical materials. All piles and timber materials would be delivered by barge. The Massachusetts Port Authority will be filing permit applications with appropriate Federal, state and local licensing agencies for this marine construction work.

VI. MITIGATING ACTIONS

In order to mitigate environmental concerns, the Federal Aviation Administration and the Massachusetts Port Authority propose to jointly give positive assurances with respect to certain elements of the proposed actions which may be perceived as having a potential for some adverse environmental effects. These are as follows:

1. Generation of Increased Landing Traffic

Should it be proposed at any time in the future to revise the existing Preferential Runway Use Procedures under which runway use assignments are made by the FAA, full environmental assessment will be prepared and filed in accordance with state and Federal environmental laws. Full opportunity for public participation will be provided in these processes.

2. Landing Minimums

The FAA will accept a restriction which the Massachusetts Port Authority will incorporate in the new or amended site leases which FAA must obtain from the airport proprietor for the centering of the localizer and the MALS/F approach light system

for Runway 15R. This restriction will be identical to those contained in the site leases for the new ILS system on Runways 22L and 27 which require that FAA file an Environmental Impact Statement under the National Environmental Policy Act, should at any time in the future it proposes to lower the landing minimums on those runways. The restriction also requires that the Massachusetts Port Authority concurrently file an environmental impact report under Massachusetts environmental law.

3. Lighting Emissions

Should the light emissions from the lighting systems proposed for installation prove to be of significant annoyance to residents living in the approach to Runway 15R, all feasible shielding measures will be explored and available alternatives reviewed with these residents to determine the most appropriate method to be employed for mitigating that annoyance.

4. Location of Second Category II System

By vote of the Massachusetts Port Authority Board several years ago, Runways 4R and 33L are the only runways on which Category II systems are permitted by that agency. The Authority has recently made a formal request to the FAA that it designate Runway 33L as the second runway at Logan for Category II installation to enhance its use for overwater approaches. The FAA is currently evaluating this request.

VI. PROPOSED IMPLEMENTATION OF ACTIONS PROPOSED

It is proposed to accomplish the construction work necessary to implement these actions during the 1980 construction season.

VII. PROJECT COST

Total estimated cost of this project is approximately \$800,000.

PROJECT LOCUS



Exhibit 1

- Instrument Landing System Approaches
1. General. The Instrument Landing System (ILS) is designed to provide pilots of properly equipped aircraft with precision electronic information for approach and landing. The system provides accurate vertical and lateral guidance to the runway. The ILS is the national standard precision system and is installed by FAA under its charter to foster safety in air commerce.

2. Description of ILS Components and Related Facilities Serving Runway 15R:
 - a. Localizer/Distance Measuring Equipment (LDME).

This facility which transmits lateral runway guidance information is presently installed as an offset facility. It is intended to relocate the system onto the Runway 33L approach light pier, approximately 1,000 feet from the Runway 33L landing threshold. Co-located with the localizer is distance measuring (LDME) equipment which transmits to the pilot his distance to the runway touchdown point.

- b. Glide Slope.

This facility transmits vertical guidance information from an on airport site which is adjacent to the runway touchdown point located approximately 1,000 southeasterly of the Runway 15R displaced landing threshold.



FEDERAL AVIATION ADMINISTRATION
PUBLIC AFFAIRS OFFICE
NEW ENGLAND REGION
DUBLIN, MASS.

MARCH, 1977

INSTRUMENT LANDING SYSTEM



Glide-slope "beam" provides vertical guidance



Localizer "beam" provides horizontal guidance



Marker or compass locator provides distance guidance

* These facilities not installed on Runway 15R. Distance measuring equipment (DME) used in lieu thereof.

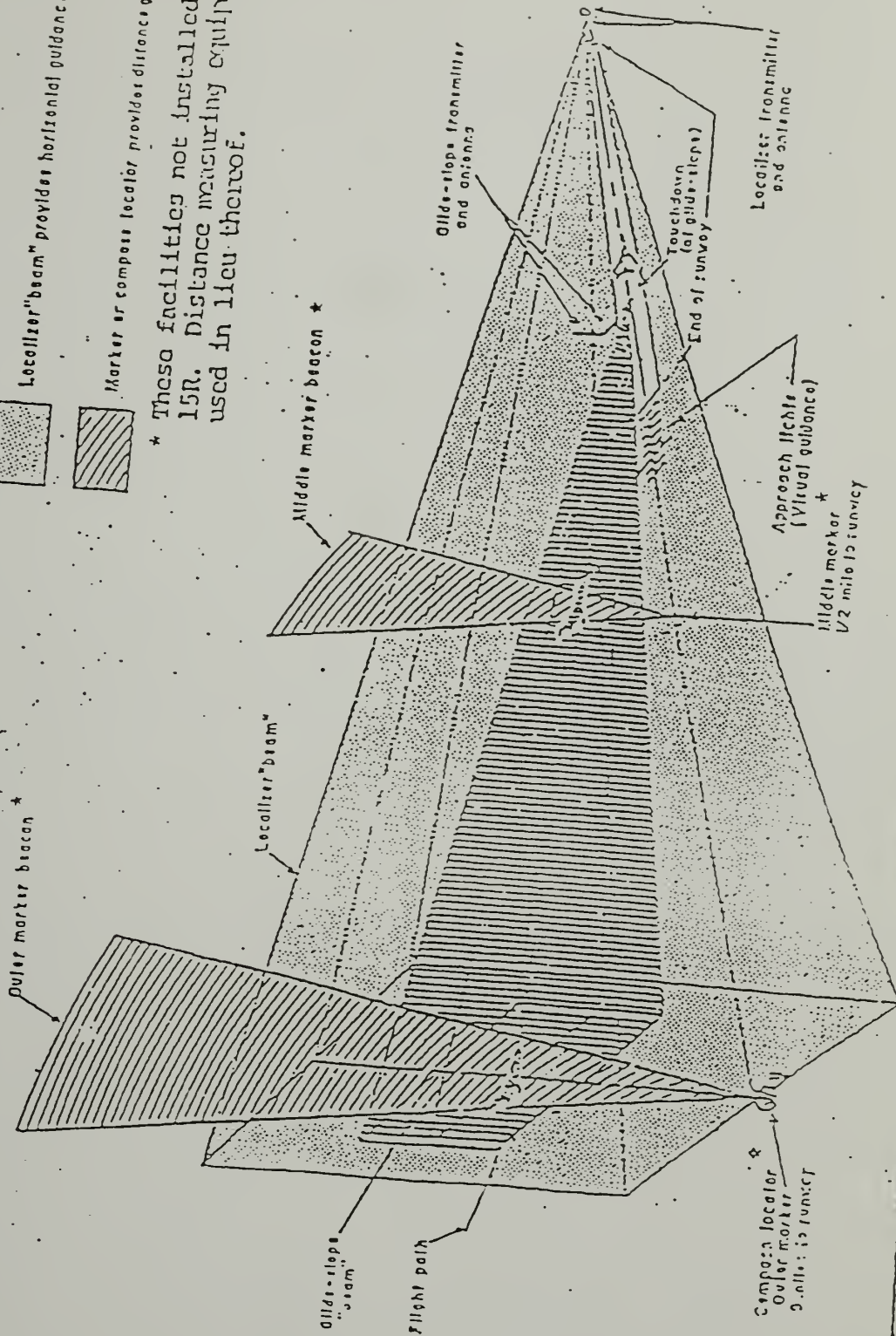


FIGURE 4

Medium Intensity Approach Light System with Flashers (MALS,F)

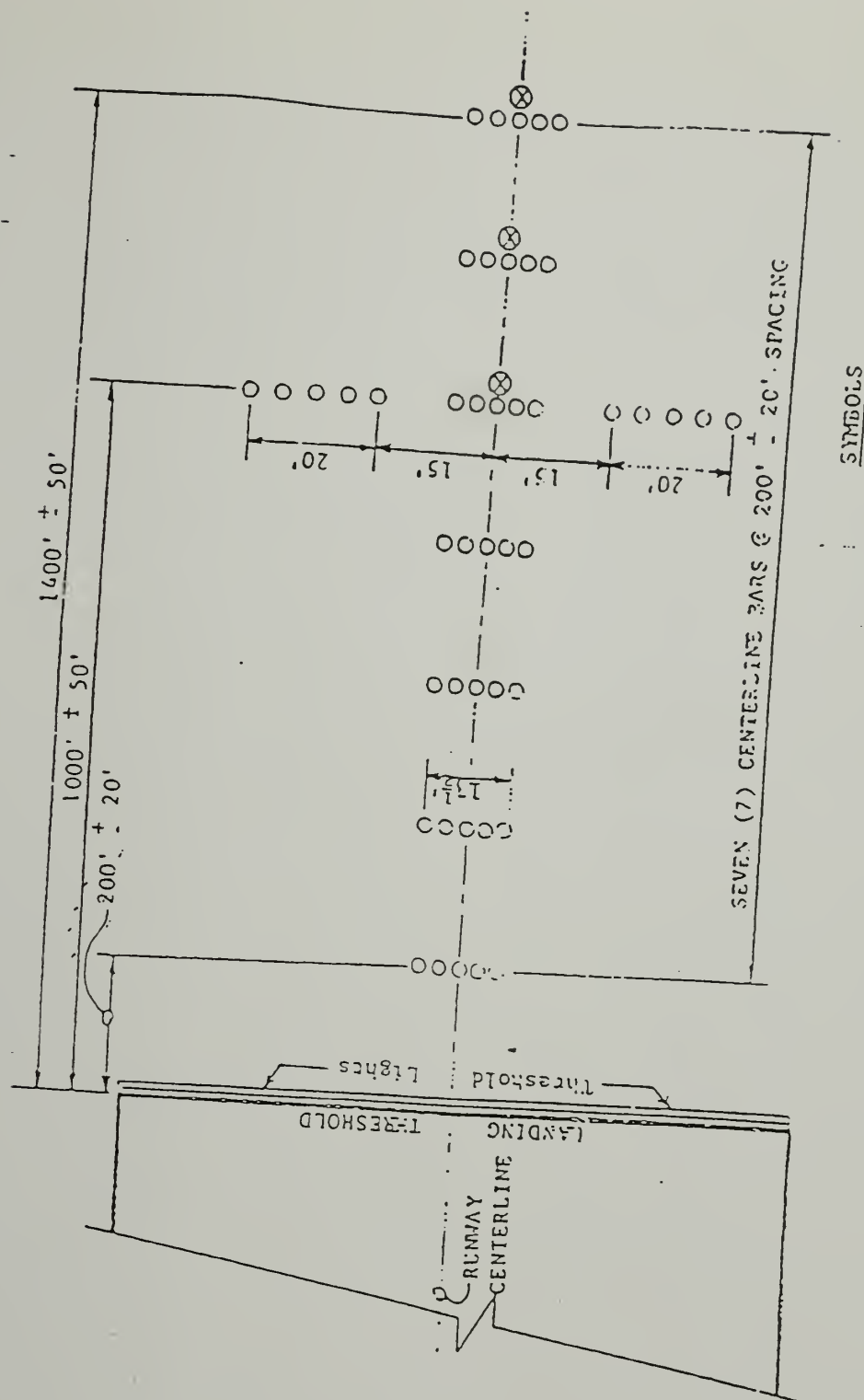
1. MALS.

- The Medium Intensity Approach Lighting System (MALS) will provide visual guidance to the pilot by radiating medium intensity focused light beams by which the pilot visually aligns the aircraft with the extended centerline of the runway. The MALS consists of light bars spaced 200 feet apart extending from the runway threshold to a point 1,400 feet from the runway threshold.

In addition to the eighteen steady burning lights in the threshold light bar, each light bar has five steady burning lights consisting of 200 watt incandescent lamps mounted below runway surface and directed through prisms in the flush mounted fixtures. These fixtures are spaced approximately 40 1/2 inches apart facing the runway approach. The MALS at 1,000 feet from the end of the runway has two additional light bars each spaced 25 feet on each side of the centerline. The MALS will have three brightness intensities, low, medium, and high. The lights will be operated by Air Traffic Control Tower personnel.

2. Flashers.

The sequenced flashers are located at the last three light bar stations. These flashers are added to the MALS to assist pilots in making an earlier identification of the system. These lights flash in sequence toward the threshold at the rate of twice per second. The flashes are of extremely short duration, measured in microseconds.



15A Configuration for
Center-Long Runway 15A

Exhibit 6

1. General

A Touchdown Zone Lighting System provides visual guidance to the pilot in the final phase of his landing approach to touchdown and can also serve as a visual extension of the approach light systems in earlier phases of the approach, particularly when associated with a short 1,400 foot approach light system such as the PALS/R.

2. Description

The TDZ system consists of 30 light bars symmetrically located on either side of the runway centerline, equally spaced at 100 foot intervals, and extending from the runway threshold for a distance of 3000 feet down the runway. Each light bar is 10 feet in width and contains three flush mounted light fixtures, the innermost fixtures being 36 feet from the runway centerline. Each light fixture contains one 200 watt lamp vertically mounted below runway grade. The light beam is directed toward the approach end of the runway through a prism in the slotted fixture top and at an angle of 5 degrees to the horizontal.

EXHIBIT B

LEASE TERMS

"WHEREAS, the Federal Aviation Administration (hereinafter called "FAA"), wishes to install a [project description] at Logan International Airport for Runway 15-Right, and

WHEREAS, the Massachusetts Port Authority (hereinafter called the "Authority") desires to have said [project description] installed in accordance with the provisions of this lease.

WHEREAS, the FAA, which has the exclusive authority to control and manage the navigable air spaces, nevertheless recognizes the concerns and wishes of the Authority and the communities surrounding Logan.

NOW THEREFORE, the Authority hereby grants to the FAA the right to install, maintain and operate all equipment necessary or incidental for the operation of [project description] on Runway 15-Right at the locations hereinafter specified in accordance with the following conditions:

1. This lease is for locations shown on FAA Drawing Nos. _____ attached hereto and made a part hereof as Attachments.
2. FAA shall have the right of access to said locations for all purposes consistent with the operation, installation, maintenance and repair of the [project description].
3. The landing minimums for Runway 15-Right will be established in accordance with those in existence on the date of this lease, which are a Minimum Decision Altitude of 268 feet MSL and visibility of 4000 feet RVR or 3/4 miles.
4. Should FAA at some future date propose to reduce landing minimums on Runway 15R, it will not do so prior to holding a public hearing and preparing a full environmental impact statement.

Letter 37

City of Boston

Honorable Mayor Thomas M. Menino

Code	Topic 1	Topic 2	Comment	Response
37.1	Environmental Review Process	Blue Ribbon Panel	The Commonwealth must convene a regional panel to evaluate the state of transportation in the region, develop comprehensive strategies to meet both short-term and long-term regional transportation needs, promote a greater variety of transportation options available for our citizens and our economy, and commit the Commonwealth to meet these goals in specific and feasible ways.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies form the basis of a comprehensive regional transportation strategy that includes the Airside Project at Logan Airport, expansion and growth of the regional airports, and the implementation of high-speed rail and other regional rail projects. All these measures are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. By the end of 2000, Boston residents had several alternatives to Logan Airport, including Worcester Regional Airport, Manchester Airport, T.F. Green/Providence Airport, Pease International Tradeport, and Amtrak's high-speed Acela train service. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of options to Logan Airport and steps Massport has taken to foster increased use of these alternatives.</p> <p>Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its assumption of operating responsibility for the Worcester Regional Airport on January 15, 2000 and its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999. An additional Summit was held in December 2000, in Rhode Island. Refer to Section 2.9 for a discussion of Massport's initiatives in support regional transportation alternatives.</p> <p>Emissions are shown to decrease with the Preferred Alternative when compared to the No Action Alternative.</p>
37.2	Air Quality	Impacts	Increased levels of VOC, CO and NOx emissions are projected as a result of anticipated growth at Logan.	

Code	Topic 1	Topic 2	Comment	Response
37.3	Air Quality	Impacts	Increase in auto and bus emissions will result from growth.	The proposed Airside Project will not stimulate additional growth in passenger activity levels at Logan Airport. Off-site motor vehicle emissions estimates are shown in Table 6.4-9 of the Supplemental DEIS/FEIR. Increases in the number of vehicles accessing Logan Airport are not analogous to increases in emissions. As indicated in the table, these emissions generally decrease in the future; as a result of improved motor vehicle emission standards, the increased use of alternative fuels, and other factors.
37.4	Air Quality	Taxiway Improvements	With the addition of the Centerfield Taxiway, there will be additional planes with idling engines adding to pollutant emissions near public beaches and residences.	The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waiting on the taxiways reducing ground noise and emissions for close in residents of East Boston and Winthrop. Dispersion modeling indicates no violations of the NAAQS at any of the sites shown on Figure 6.3-1 of the Supplemental DEIS/FEIR, including those at public beaches and residential areas.
37.5	Air Quality	Model	Current Massport soot monitoring protocols are not sufficient to determine the effect on air quality.	The two soot monitoring programs conducted by Massport are scientifically accurate. Studies concluded that the soot was attributable to background (ambient) conditions in an urban environment, and not to airport-related activities. Refer to the <i>Logan Airport 1994/1995 GEIR</i> for additional information.
37.6	Air Quality	NAAQS	Current complaints about air quality, odor and soot emissions by affected residents continue and indicate current levels are not acceptable and have not been addressed.	Massport employs a GIS mapping system to correlate air quality and odor complaints with meteorology, airport use, and other factors. The soot sampling and monitoring programs indicate that Logan Airport is a very small (<i>i.e.</i> , less than one percent) contributor. In addition, the NAAQS serve as an indicator of the acceptability of current pollutant concentrations since these standards were designed to protect human health and welfare. Dispersion modeling indicates no violations of the NAAQS.
37.7	Noise	Taxiway Improvements	There will be additional noise from idling engines on the Centerfield Taxiway which will immediately impact residents of East Boston and Winthrop.	<p>The ground taxi noise calculated for the northeast end of Runway 4/22, at locations in Winthrop and East Boston, show small to moderate <i>reductions</i> in ground noise of 2 to 3 dB for the Preferred Alternative when compared to the No Build Alternative (refer to Tables 6.2-15, 6.2-16, and 6.2-17 in the Supplemental DEIS/FEIR). This is true for average and for maximum propagation conditions and for all operational scenarios examined. The main reason for these noise decreases is the reduction of the number of taxiing aircraft waiting to takeoff on Runways 22L and R.</p> <p>The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waiting on the taxiways reducing ground noise and emissions for close in residents of East Boston and Winthrop.</p>
37.8	Noise	Impacts	Current complaints by residents indicate that existing noise levels are not acceptable.	Massport is a national leader in the implementation of an aggressive residential sound insulation program. Over the last decade, the affected population within the 65 dB DNL contour has been shrinking, attributable to improvements in aircraft technology and noise control, and better attainment of PRAS goals. Massport continues to explore means of further reducing noise in areas around Logan Airport.
37.9	Noise	Runway Use	Massport has indicated that Runway 14/32 is to be used primarily during periods of northwest winds and inclement weather. This will increase noise volumes in the flight path.	The operations of Proposed Runway 14/32 would be over the water. The departures on Runway 14 would turn over the inner harbor and proceed out the harbor mouth, as do the departures on Runway 15R, the nighttime preferential runway. Similarly, the last several miles of the approach path to Runway 32 would be over water and largely uninhabited islands. When Runway 14/32 is in operation, it would reduce the noise exposure over populated communities.

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37.10	Noise	Runway Use	Lowering landing minimums on Runway 27 will increase noise for residents of Winthrop. Lowering landing minimums on Runways 22L and 15R will increase noise for residents of East Boston and Revere.	Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise. For example, reducing the Runway 22L decision height to 200 feet moves the maximum noise point to approximately 3,000 feet from touchdown which is further from populated areas in East Boston than the current maximum noise point. Although categorically excluded from NEPA review, modeling of the changes in runway availability from reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result were included in the Airside Project in compliance with an earlier agreement among Massport, the FAA and the City of Boston.
37.11	Environmental Review Process	Permitting	Massport has not provided the Boston Conservation Commission with adequate information about its monitoring or its compliance with the Orders of Conditions to protect the harbor and the valuable remaining wetlands.	Massport presents data regarding outfall monitoring in its GEIR/ESPRs and its subsequent Annual Updates. Similarly, Massport has developed extensive documentation regarding its development of the new salt marsh restoration area along Taxiway November. The Airside Project has been designed in a manner to avoid any wetland or harbor construction and a mitigation program has been developed to ensure that the project will not adversely affect water resources.
37.12	Water Quality	NPDES Permit	Massport is not in compliance with the National Pollution Discharge and Elimination Systems permitted outfalls at Logan.	A review of NPDES outfall monitoring data since 1995 indicates that Massport has consistently improved compliance with its NPDES permit limits for its permitted outfalls. This information is reported to the EPA, as required, and also is reported on an annual basis in the Logan Airport GEIR and its Annual Updates.
37.13	Water Quality	Stormwater	No pollution treatment structures for the North, Porter and Maverick Outfalls, which serve 306 acres, are discussed as required.	<p>The North and West Outfalls are equipped with water pollution control devices such as oil/water separators and grit collectors, and were upgraded in Spring 2000.</p> <p>The construction of the Centerfield Taxiway or Runway 14/32 would not affect the drainage system for the North Pollution Control Facility. Similarly, the drainage system for the Maverick Street and Porter Street outfalls would be unaffected by the proposed taxiway construction.</p> <p>Construction, however, would occur in portions of the drainage area for the West Outfall and a number of the smaller culverts that drain the airfield. Approximately 55 acres of the airfield drainage will be redirected from the West Outfall to existing perimeter drains. The perimeter drains will be directed through a low-flow chamber sized to handle the first flush of stormwater before being discharged. This reconfiguration is shown in Figure 6.6-1 of the Supplemental DEIS/FEIR. The reconfiguration results in an 18 percent reduction in the drainage area for the West Outfall. The reduction in flow of generally uncontaminated airfield drainage is expected to increase the efficiency of the West Outfall to treat flow from the terminal areas.</p> <p>As described in Section 6.6.4 of the Supplemental DEIS/FEIR, Best Management Practices will continue to be implemented to minimize the discharge of sediment, and a low-flow chamber will be installed to treat first flush stormwater flows from drainage areas redirected from the West Outfall.</p>

Code	Topic 1	Topic 2	Comment	Response
37.14	Alternatives	Blast Fence	Before its removal, alternatives to the Blast Fence that provides marginal protection from noise, fumes and blast effects from take-offs for residents must be identified and funded.	The blast fence is not part of the Airside Project. Removal of the blast fence underwent a separate state environmental review process. An EOE Certificate requiring no further environmental analysis was issued in February 2001.
37.15	Health Effects	Studies	To date, little or no analysis or study of the affects on public health from Logan operations has been conducted.	<p>Massport has provided the City of Boston and public health agencies with air quality and emissions data.</p> <p>In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 <i>Report to the Mayor, Health of Boston</i> prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the <i>Soot Deposition Study</i> with public health agencies and is cooperating with the Harvard School of Public Health on the <i>South Boston Particle Source Apportionment Study</i>.</p> <p>Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.</p>
37.16	Environmental Justice	Impacts	No analysis of federal Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.
37.17	Cumulative Impacts	Master Plan	The DEIR/S does not address the link between air transportation supply and ground transportation demand.	The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.
37.18	Purpose And Need	Delay	The DEIR/S assumes that passenger traffic at Logan Airport will grow irrespective of airport capacity and resulting delay.	Growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in current and future passenger and aircraft activity at Logan Airport.
37.19	Environmental Review Process	FAA/NEPA	The DEIR/S does not present a reasoned Build vs. No-Build analysis of airport capacity with and without Runway 14/32, nor the resulting impacts on ground transportation (regional highways, local streets, transit modes).	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPP</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).

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37.20	Ground Transportation	Access to Logan Airport	The DEIR/S does not adequately justify some of its future projections of transit and HOV mode share.	The Airside Project does not result in additional demand for ground access services. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan, targeted HOV shares, forecasted Vehicle Miles Traveled, and trips by mode for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis. The <i>Logan Airport 1999 Environmental Planning and Status Report</i> (previously GEIR) provides a status report on Massport's ground access initiatives and HOV ridership for 1999.
37.21	Ground Transportation	HOV	The DEIR/S does not differentiate the various types of HOV travel, nor does it take into account the full impacts of certain types of travel that are considered HOV (e.g., taxi and drop-off trips, passengers who drive alone to park in Chelsea are considered HOV trips because they take a shuttle one mile to Logan).	Refer to response to Comment 37.20.
37.22	Ground Transportation	TMA	The DEIR/S does not provide adequate information on Logan Transportation Management Association membership, participation, or plans for increasing participation.	The <i>Logan Airport 1999 Environmental Planning and Status Report</i> reported on Logan Airport Employee TMA achievements in 1999, including an increase of 14 member organizations, with a total of 6,200 employees.
37.23	Ground Transportation	Access to Logan Airport	The DEIR/S does not provide adequate proposals for improving utilization of the MBTA Blue Line by air passengers.	The Blue Line Modernization Program is discussed in the <i>Logan Airport 1999 Environmental Planning and Status Report</i> (formerly the GEIR) which was filed with the Secretary of Environmental Affairs on December 15, 2000.
37.24	Purpose and Need	Airfield Capacity	The DEIR/S does not adequately justify construction of the Centerfield Taxiway. Adequate runway crossing opportunities and airplane queuing capacity currently exist, and the construction of the Centerfield Taxiway would result in excessive aircraft idling.	The Centerfield Taxiway will significantly reduce ground delays and enhance the controllers' flexibility in routing inbound and outbound aircraft when Runways 4L/R or 22L/R are in use. The Centerfield Taxiway will <i>reduce</i> aircraft idling, particularly on Taxiways November, Romeo and Yankee waiting to cross Runway 4L/22R. For more details, refer to responses to Comments 37.64 through 37.69.
37.25	Purpose and Need	Delay	Runway 14/32 would address weather-related delays, but these are only a portion of the airside delays. The DEIR/S does not provide information on the relative impact of different causes of delay: weather, mechanical, and delays originating from other airports.	Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion by addressing constraints at Logan Airport. Delays caused by conditions at other airports or other factors, such as mechanical failure, are not addressed since Massport cannot influence these delays. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.

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37.26	Alternatives	Peak Period Pricing	The DEIR/S discounts peak period pricing because it is assumed to reduce regional air service. Massport should analyze a peak period pricing scenario, which considers a shifting of some service to other regional airports.	Regional carriers are not likely to shift operations to regional airports in response to PPP because doing so would likely reduce on-board passengers and the economic viability of the service. Regional carriers at Logan Airport carry a mix of local and connecting passengers. As the largest city in New England, Boston and the immediate vicinity represent the largest concentrations of local demand for regional carrier markets. Also, up to 50 percent of passengers on regional flights connect to other flights at Logan Airport. Shifting regional flights to other airports, such as Manchester or T.F. Green/Providence, would likely reduce the number of on-board passengers since a significant number of passengers are traveling to the City of Boston or connecting to flights that are not available from the regional airports. For example, service to Manchester Airport would not be a viable alternative for a Provincetown passenger traveling to a location in downtown Boston. Likewise, service to T.F. Green/Providence Airport would not be attractive to a Bangor passenger trying to reach Denver, since there are no nonstop services between Providence and Denver.
37.27	Regional Transportation	Regional Airports	There is no description of a regional plan that actually diverts traffic from Logan.	The regionalization of aviation in New England is currently underway. As a result of capital investment, service expansion at regional airports and coordinated efforts between Massport and other federal, state and local agencies, since 1996, eight out of ten new passengers in New England are using the regional airports. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of the emerging roles of the Logan, T.F. Green/Providence, Manchester, and Worcester Regional airports in the aviation transportation system and on upcoming New England Airports System Study.
37.28	Regional Transportation	Regional Airports	There are no funding requests in the Transportation Bond Bill for upgrades at Worcester, Hanscom, or Fort Devens to improve infrastructure and public transit as part of a regional strategy.	Worcester Regional Airport has existing terminal and airport infrastructure and has been targeted for increased use and future service expansion. MassHighway is in the process of beginning the preparation of the Draft EIS/EIR for highway improvements to improve access to Worcester Regional Airport.
37.29	Alternatives	Peak Period Pricing	Peak pricing is not explored as a tool to divert flights in the region.	Section 4.5 of the Supplemental DEIS/FEIR discusses PPP at length. Chapter 2 of the Supplemental DEIS/FEIR addresses ongoing regional strategies.
37.30	Purpose and Need	Airfield Capacity	The City of Boston views the proposed project as a capacity enhancement plan.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway would not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year, but rather would allow this capacity to be maintained more consistently.

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37.31	Environmental Review Process	Blue Ribbon Panel	The City of Boston finds the DEIS/R deficient in many respects and respectfully requests that...[a] regional panel of experts be convened to immediately assess the overall state of transportation in the region; [t]his panel develop strategies for both short- and long-term regional transportation needs and identify a variety of transportation options available for the traveling public and the movement of goods; and [c]ommunities in the region be fairly and adequately represented on such a panel along with public officials, economists, land use planners, and representatives of environmental and public health interests.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>As summarized in the Draft EIS/EIR, a number of studies that address regional transportation planning issues have been conducted over the last ten years. These studies have concluded that the Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high speed rail are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation.</p> <p>Chapter 2 of the Supplemental DEIS/FEIR discusses the entire region's air transportation system, along with a discussion of alternative modes, specifically high-speed rail, and describes the regional study and its major conclusions.</p>
37.32	Air Quality	Alternative Fuels	Massport is to be commended for its program to convert its ground service vehicle fleet to alternative-fueled vehicles.	Comment noted. Massport has initiated and participated in a number of programs to encourage use of alternative fuels at Logan Airport, and has received national recognition for its efforts.
37.33	Air Quality	Alternative Fuels	The City has suggested in prior comments on Massport MEPA filings that important steps in mitigating the air quality impacts of Logan may include lease agreements with new or renewing tenants that contain requirements or incentives, such as reduced curb fees for private fleet operators, for use of low or no emission vehicles by tenants.	Massport offers a 25 percent discount on ground access fees to operators of qualified alternative fuel vehicles (AFVs). In addition, Massport has participated in several grant programs to encourage tenant use of AFVs. A status report on achievement of Massport ground access initiatives is provided in the <i>Logan Airport 1998 Annual Update</i> and is reported in the <i>Logan Airport 1999 Environmental Planning and Status Report</i> (previously GEIR).
37.34	Air Quality	Impacts	The City believes that additional measures are necessary and requests that Massport and a regional transportation task force investigate other available technologies, particularly from companies based in the region, for reducing air emissions.	Massport is separately studying measures for reducing Logan Airport's contribution to air emissions in the region, in the <i>Logan Airport 1999 ESPR</i> (previously GEIR). Consideration is given to all emissions sources, and analysis is conducted for the airport, East Boston and regional study areas.
37.35	Ground Transportation	Mitigation	For several years, Massport has indicated that it is evaluating the benefits of moving bus servicing and other operations to off-airport locations. This will add vehicle trips to current levels, a detriment to air quality. The City has twice requested that a detailed analysis and discussion be presented in a GEIR or Annual Update but Massport has never responded to this inquiry.	Massport's efforts to minimize vehicle trips are documented in the <i>Logan Airport 1999 ESPR</i> (previously GEIR). Massport continues to evaluate the benefits of moving bus services to off-airport locations. No definitive decision has been made at this time.

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37.36	Air Quality	Impacts	Massport has stated in prior environmental review documents that PM _{2.5} data for aircraft are not currently available. This is surprising since aircraft engines have undergone emissions testing for many years. This should be a subject evaluated in scientific and technical detail by the regional panel of experts. Findings and recommendations on this issue should be a component of a regional transportation report.	Particulate Matter (PM) emission factors for aircraft are very limited, at best, and nonexistent in most cases. Therefore, as a conservative, worst-case assumption, the air quality analysis assumed that all PM is less than 10 microns in diameter. No emission factors or approximation methods are available for PM _{2.5} .
37.37	Air Quality	Model	Given the continued reporting of anecdotal evidence of soot deposition and the open issues as to the accuracy and robustness of the soot monitoring protocol...this matter demands further study. Coupled with the continuing problem of odor from aircraft operations, the overall emissions from all airside operations should be the subject of a truly comprehensive, state-of-the-art monitoring and modeling study.	Monitoring of airborne soot levels in the vicinity of Logan Airport has shown that the airport is a very small (less than one percent) contributor. The air quality analysis, based on EPA/MDEP models and guidelines, performed for the Supplemental DEIS/FEIR is considered to be comprehensive and state-of-the-art.
37.38	Air Quality	NAAQS	The proposed Runway 14/32, at a minimum, facilitates more aircraft operations per hour during certain weather conditions. This is especially of concern when 14/32 is used for departures (wind out of the southeast) and emissions from take-off are blown back into the neighborhood. The result is that the Jeffries Point neighborhood and surrounding areas may experience an increase in concentration of jet emissions during southeast wind conditions.	The dispersion modeling results indicate that concentrations of pollutants will be below the NAAQS at all times. The Supplemental DEIS/FEIR reports worst-case conditions, meaning air quality will be better than this under almost all conditions. A full year of actual weather data was used to conduct the dispersion analysis. In summary, actual wind conditions have been used to model pollutant concentrations at Jeffries Point, where no violations of the NAAQS were projected. Furthermore, Runway 14/32 will primarily be used for arrivals. Also it will not increase the number of operations during northwest winds, but will allow projected operations to be accommodated with fewer delays.
37.39	Alternatives	Runway 14/32	Runway 14/32 is part of Logan Airport's overall program to increase passenger levels to a minimum of 37.5 million in 2010 and, as such, contributes to the increase in emissions generated by the new aircraft operations.	Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport. Refer also to Section 4.2. The availability of Runway 14/32 is projected to produce a small improvement in air quality from improved efficiency of airfield operations.
37.40	Noise	Taxiway Improvements	The City respectfully disagrees with the statement in the DEIS/R that the Centerfield Taxiway will reduce noise impacts from taxiing aircraft in the areas located north/northeast of the airport.	Comment noted. Massport reaffirms the validity of its analysis. Refer to responses to Comments 37.7 and 37.24.
37.41	Alternatives	Preferred Alternative	East Boston residents view the blast fence as a device the partially mitigates fumes, noise and blast effects from takeoffs on Runway 22R. Massport believes that it has an obligation to take the fence down because it is non-frangible, and would therefore present a hazard to flight personnel and air passengers in the event of a crash. ... An alternatives analysis, prior to the filing of environmental documents, should include the results of a detailed investigation of a non-frangible barrier and other methods to ensure that the quality of life in and adjacent to Orient Heights is not further degraded.	Refer to response to Comment 37.14.

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37.42	Noise	Runway Use	The City does not agree with the FAA's assertion that lowering landing minimums will result in noise benefits for residents under the approach path to the runways in question. ... Lowering the landing minimums is likely to result in the use of these runways more often during poor weather conditions, exposing nearby residents to noise levels which they currently do not experience. The City of Boston believes that lowering the landing minimums will only serve to expose already overburdened residents to additional noise impacts.	Response to Comment 37.10 addresses the fact that the flight paths themselves do not change, and Appendix D in the Airside Project Draft EIS/EIR includes a complete discussion of the impacts of lowered landing minimums. The lowered minimums allow the use of runways more closely aligned with the prevailing winds, thereby increasing safety. The runway use would change imperceptibly by the reduced minimums—less than 0.2 percent of equivalent operations—and these flights represent shifts from Runway 4, not additional operations.
37.43	Alternatives	Reduced Approach Minimums	The DEIS/R indicates that the reduction of approach minimums is consistent with the minimums in effect at other major commercial airports. Current industry practice for major commercial airports allows for greater use of the four runways under certain weather conditions. ... The City questions if the referenced "major commercial airports" are located in similar areas. When other major commercial airports are referenced in environmental review documents, the locations and characteristics of these airports should be detailed.	The reduced minimums at Logan Airport would be consistent with recommended practices as established in FAA Order 8260.3B, <i>United States Standards for Terminal Instrument Procedures</i> . These standards are used at all airports in the United States, and in many other nations around the world. These standards are already used for Runway 4R approaches at Logan Airport. To cite two typical examples, both La Guardia New York and Washington Reagan Airports have Category I ILS with a minimum ceiling of 200 feet above ground level and one half-mile visibility.
37.44	Alternatives	Reduced Approach Minimums	As noted in the DEIS/R, the City of Boston entered into an agreement with the FAA and Massport not to decrease the landing minimums on Runway 15R. It is our intention that this agreement should be respected and honored... With the high number of residents living alarmingly close to the touchdown point of these two runways (22L and 15R), the lowering of the landing minimums will place these residents in additional peril.	The agreement between the City of Boston, the FAA and Massport stipulates that any modification of the existing minimums requires completion of an EIS/EIR, even though the setting of minimums is otherwise categorically excluded from the EIS/EIR process. The reduced minimums will, in fact, enhance safety by providing precision guidance to a point closer to touchdown and reducing reliance on Runway 4R under poor weather conditions, when winds may favor use of an alternate runway. Also, refer to responses to Comments 37.10 and 37.42.
37.45	Water Quality	NPDES permit	The City finds this reporting [on NPDES permitted outfall monitoring] imprecise and misleading and it is apparent that discharges are not meeting the EPA's NPDES limits.	Refer to response to Comment 37.12
37.46	Water Quality	NPDES permit	The DEIS/EIR does not identify any pollution treatment structures for the North, Porter and Maverick Outfalls that, combined, serve a 306-acre drainage area. It is also unknown if the 50 perimeter outfalls treat pollutants and if they are monitored and maintained.	Refer to response to Comment 37.13. As required by its NPDES Discharge Permit, Massport conducts water quality monitoring at the four outfalls that convey drainage from the "industrial" portions of Logan Airport, such as the fuel farms, terminals, car rental facilities, and maintenance facilities. These are the North, West, Porter and Maverick outfalls. Federal regulations do not require Massport to monitor the "non-industrial" drainage from the airfield that discharges through approximately 50 perimeter outfalls. The perimeter outfalls are not equipped with treatment devices, since the airfield areas they drain are not a significant source of contaminants or suspended solid materials. The perimeter outfalls are routinely inspected and maintained, as needed, by Massport.
37.47	Water Quality	Stormwater	While Massport identifies its existing drainage structures, there is no information describing drainage plans for 14/32 runoff. ... The proposed airside improvements will result in the conversion of 39.4 acres of vegetation to paved surface. Massport anticipates the need to use more de-icing agent with the proposed improvements. If overland dispersion is presently a method of treating these compounds, how will the loss of 39.4 acres be addressed? How will Massport mitigate this loss of pervious area?	As stated in the Draft EIS/EIR, Runway 14/32 will be de-iced when weather conditions dictate. Taxiways are, however, not routinely de-iced and there will be no additional aircraft de-icing or satellite de-icing stations required for the project. The existing drainage system will be reconfigured, where necessary, to accommodate additional stormwater runoff. As stated in the response to Comment 37.46, the airfield is not a significant source of contaminants. However, Massport will install a low-flow chamber to capture any contaminants contained in the first flush stormwater. Although portions of the airfield pervious surfaces will be paved, adequate vegetated areas will be provided between paved surfaces and the new drainage inlets to provide suitable levels of treatment.

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37.48	Water Quality	NPDES permit	It is obvious when one reviews Logan AUs (GEIR Annual Updates) that Massport is experiencing difficulty in complying with the BCC (Boston Conservation Commission) Orders of Conditions and EPA NPDES permits conditions...The City asks that Massport review its permits, including all perpetual Orders of Conditions, and provide evidence that these conditions are being met.	As a condition of the NPDES Permit, Massport monitors water quality for pH, Oil and Grease, and Settleable Solids three times each month at the North, West, Porter and Maverick outfalls. These outfalls include all drainage from the terminal and fuel farm areas, and some runway and infield areas. The monthly monitoring is conducted (1) in dry conditions; (2) in wet weather conditions and (3) immediately following a storm event. This sampling and other monitoring has helped Massport to improve permit compliance significantly. During 1998, there was 100 percent compliance for pH. Oil and Grease limits compliance was 100 percent at the West Outfall; 97 percent at the North and Maverick Outfalls; and 94 percent at the North Outfall. A copy of the 1998 Water Quality Management Update is contained in the <i>Logan Airport 1998 Annual Update</i> and additional information is provided in Appendix I of that document. (Refer to Table of 1998 NPDES Compliance and Summary of 1995-1998 Compliance Averages). Massport's outfall sampling summary for Logan Airport in 1999 is contained in Appendix H of the <i>1999 ESPR</i> .
37.49	Water Quality	Stormwater	[Provide documentation that this commitment is being met]: DEP File No. 6-464, March 13, 1991, Logan Landscaping Improvements Special Conditions.	All on-site drainage structures are routinely inspected. As with all Logan Airport construction projects, contractors are required to implement and maintain full erosion and sediment control program throughout construction. Massport has an ongoing program to stencil surface drains that discharge to Boston Harbor.
37.50	Environmental Review Process	Permitting	[Provide documentation that this commitment is being met]: DEP File No. 6-467, June 19, 1991, Massport Employee Parking and Associated Roadway Special Conditions.	Although permit approvals for this project were secured, Massport never constructed this project.
37.51	Environmental Review Process	Permitting	[Provide documentation that this commitment is being met]: DEP File No. 6-516, July 22, 1992, Massport Test Borings/Logan.	There were no discharges or spillage of fuel, oil, or other pollutants during the test boring program. As with all Massport contracts, an emergency spill management program was in effect throughout the test boring program.
37.52	Environmental Review Process	Permitting	[Provide documentation that this commitment is being met]: DEP File No. 6-544, May 12, 1993, Logan Safety Ends.	During construction of the Runway-End Safety Improvements, erosion and sedimentation control practices were fully employed. Exposed landside soil was stabilized and vegetated quickly. Siltation booms were deployed in Boston Harbor and water quality monitoring was conducted as required in the Boston Conservation Commission Order of Conditions. Massport continues to monitor and maintain the runway end safety areas to assure their stability. There were no newly constructed or relocated catch basins associated with construction of the runway end safety improvements.

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37.53	Ecosystem	Rare Species	The City strongly objects to the suggestion that off-site [habitat] mitigation should occur outside of the Boston Harbor area.	Upland Sandpipers require extensive areas of grassland habitat. This type of habitat has dwindled steadily throughout New England as a result of natural succession of these areas to forest and through development. Many of the remaining large grassland areas in the Commonwealth and throughout New England are found at airports. Because of the hazard that birds present to aircraft and the flying public and because of the potential hazards to the birds, Massport has worked with the Natural Heritage and Endangered Species Program to develop a mitigation program that is removed from airport operations to the maximum extent practicable. Camp Edwards provides an excellent opportunity to reclaim a former grassland that is currently being lost to forest and restore a population of Upland Sandpiper that has declined over the past decade. Restoration of a degraded habitat is considered to have a much greater potential for success as compared to constructing a new habitat area of over a hundred acres in the Boston Metropolitan area even if such a suitable site were to be located.
37.54	Health Effects	Studies	The Boston Public Health Commission believes that Massport, the FAA and the U.S. Department of Transportation have failed to take the health of Boston residents into consideration in planning the proposed project.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport.
37.55	Environmental Justice	Impacts	The City asks that the FAA and DOT comply with Executive Order 12898 and provide documentation and all relevant data to that effect.	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Noise was found to be the only adverse impact from the Preferred Alternative with the potential for Environmental Justice impacts. Additional demographic analysis of the noise-affected areas was conducted to determine if minority and/or low-income populations would be disproportionately affected by the Preferred Alternative. This analysis found that there is no high and adverse disproportionate impact caused by the Preferred Alternative.
37.56	Environmental Review Process	MEPA	The City of Boston requests that the Secretary find this DEIS/R inadequate on the grounds that there is no analysis of the landside transportation impacts of the proposed Runway 14/32. The DEIS/R's reliance on analysis included in the GEIR is unacceptable, since the GEIR does not include specific impacts related to Runway 14/32. The City finds that many of the GEIR's assumptions related to HOV and transit modes are questionable, and that these assumptions should be re-examined.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act..." Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

Code	Topic 1	Topic 2	Comment	Response
37.57	Purpose and Need	Delays	The DEIS/R's neglect of landside transportation issues is based on the premise that Runway 14/32 will not add capacity, only relieve delay. The City strongly questions the premise that passenger demand at Logan Airport is inelastic with respect to delay...It is illogical to suggest that such an increase in delay would not result in a shift in air service to New England's other airports or other services to substitute for air travel to and from Logan Airport.	The construction of unidirectional Runway 14/32 would not be expected to induce additional aircraft operations or passenger traffic at Logan Airport. Refer to Section 4.2. Increased use of the regional airports surrounding Boston and alternative transport modes (e.g., high-speed rail) is reflected in the planning forecasts used for the Airside Project operational and environmental analyses.
37.58	Regional Transportation	Regional Airports	Such a shift in activity [to air service to New England's other airports] would result in divergent Build and No-Build conditions. This demands that Massport analyze the difference between the Build and No-Build conditions. Massport should be required to examine runway operational capacity, landside trips by mode, impact on roadway and transit capacity, and unfulfilled passenger and cargo demand that could be accommodated at other regional airports and transportation facilities.	Both the No Action Alternative and the Preferred Alternative assume increased use of regional transportation options. Analysis of operational capacity for Logan Airport runway configurations under various weather conditions was performed and represents a central input in the operational analysis presented in Chapter 4 of the Supplemental DEIS/FEIR. The recommended airside projects will not affect ground access demand or capacity at Logan Airport. The <i>Logan Airport 1999 ESPR</i> (previously GEIR) reports on vehicle trips by mode for both current and forecast passenger demand levels at Logan Airport. Chapter 2 of the Supplemental DEIS/FEIR examines passenger demand that could be accommodated at the regional airports surrounding Boston.
37.59	Ground Transportation	Impacts	The GEIR's traffic analysis sections have consistently been fraught with unsupported assumptions and questionable methodologies. ... The Boston Transportation Department suggests that Massport re-think traffic impact analysis in terms of vehicle-miles traveled and passengers per vehicle trip.	<i>The Logan Airport 1999 Environmental Planning and Status Report</i> (previously GEIR) includes an updated traffic impact analysis that discusses Vehicle Miles Traveled and Massport's ground access management achievement.
37.60	Ground Transportation	Access to Logan Airport	Massport appears to rely on additional passenger and employee parking facilities just outside the East Boston parking freeze area to get employees and passengers within shuttle range of the airport. This puts an increased burden on private sector carriers and nearby communities to accommodate potentially dramatic increases in vehicle trips. This would certainly seem to work against the goals of the Transportation Management Association (TMA).	There are currently approximately 2,000 active airport employee and commercial parking spaces at various off-airport locations in Chelsea, which is outside the limits of the East Boston Parking Freeze area. These include 1,550 airport employee parking spaces in the Chelsea Parking Garage that are leased by Massport, 500 airport employee parking spaces that are controlled by Delta Air Lines for their employees, and 800 commercial parking spaces at the Park, Shuttle and Fly site on Marginal Street. The environmental impacts of these parking spaces were analyzed as part of the <i>Chelsea Garage DEIR</i> (prepared in 1992) and were confirmed by an additional analysis conducted in support of the <i>West Garage Final EIR</i> (prepared in 1995). Both analyses demonstrate that the provision of these parking spaces reduces vehicle trips and VMT on local East Boston streets and results in measurable air quality benefits.
37.61	Ground Transportation	TMA	The 1997 Annual Update does not provide information about the number of employees who belong to the TMA or who receive an MBTA pass subsidy. No explanation is offered for the TMA estimate that a reduction of only 250 to 300 employee commuter vehicle trips may result from Transportation Demand Management measures.	<i>The Logan Airport 1999 Environmental Planning and Status Report</i> (previously GEIR) provides an accounting of the achievements of the Logan Airport Employee TMA. In 1999, five new organizations joined the TMA, bringing member organizations to 14 and the number of employees to 6,200.
37.62	Ground Transportation	Access to Logan Airport	Completion of the MBTA's Blue Line Modernization Program is described as a project that, in conjunction with the Airport Intermodal Transit Connector and other transit projects, will help increase the number of airport passengers using transit. Although the MBTA has not announced a final project schedule for the Blue Line project, it has been progressing at a slower than anticipated pace. This situation must be taken into account in assessing the impacts of increased operations and passenger levels.	Refer to response to Comment 37.23.

Code	Topic 1	Topic 2	Comment	Response
37.63	Purpose and Need	Airfield Capacity	It is not clear why three (3) crossing points to Runway 4L are insufficient to handle most, if not all, capacity situations. Based on Massport's assertion that three crossing points are inadequate, specific information is lacking to substantiate the claim... The Runway 4R scenario fails to justify the benefits of the Centerfield Taxiway... Massport's claim that the Centerfield Taxiway will move this type of activity away from the community lacks merit.	Currently, approximately 75 percent of Runway 4R jet arrivals exit at Taxiway Yankee or Runway 33R. These aircraft cannot exit earlier because of landing distance requirements, and exiting on Taxiway Romeo or later greatly increases taxi time and distance unnecessarily. Aircraft crossing at Runway 33R are forced to queue on the runway to cross Runway 4L at this single crossing point and then use Taxiway November (along with any aircraft that exited via Taxiway Romeo or later) to get to the terminals. This queuing and the use of Taxiway November has adverse air quality and ground noise impacts on East Boston near Constitution Beach. The Centerfield Taxiway will allow these aircraft to taxi southward and cross the runway simultaneously at multiple points closer to the terminals. Appendix K in the Airside Project Draft EIS/EIR demonstrates that these delays will be cut by nearly 48 percent or more. It will also reduce congestion on Inner and Outer Taxiways Alpha and Kilo.
37.64	Alternatives	Taxiway Improvements	While the Centerfield Taxiway would provide an additional taxiing route to both Runways 22L and 22R, the City believes that the delay benefits may be exaggerated... The Centerfield Taxiway will be 9,300 feet in length. Since both the FAA and Massport will not agree to limit the number of aircraft allowed to queue on the Centerfield Taxiway, this will result in the potential for FAA ground controllers to approve permission for 40 to 50 aircraft to taxi to either Runway 22R or 22L. The City finds it difficult to comprehend how any aircraft located in the rear of this enormous queue would depart any earlier than if the pilot was waiting at a gate with the plane's engines off. Delays would remain, with the only difference being in the location of the aircraft at the airport.	Refer to response to Comment 37.130. The estimates of the taxiway delays were generated with FAA-approved and universally accepted modeling techniques, and the delay benefits are realistic expectations. Forty to fifty aircraft represent nearly an entire hour's departure flow at peak traffic conditions, and only about ten percent of these use Runway 22L. Extra aircraft idling on the taxiway system would cause unnecessary costs to the airlines, unnecessary environmental impacts, and increased taxiway congestion which would inhibit the ability of controllers to move aircraft to and from the runways.
37.65	Alternatives	Taxiway Improvements	Additional information and clarification are necessary on the environmental benefits [of the Centerfield Taxiway], both from a noise and air quality perspective.	Section 6.2 of the Supplemental DEIS/FEIR shows that there are small noise benefits from the construction of the Centerfield Taxiway. The principal effect of the Centerfield Taxiway is to reduce the number of aircraft waiting on the Taxiway November, thus benefiting East Boston. It also should eliminate aircraft landing on Runway 4R from waiting to cross Runway 4L and aiming their intake noise toward Constitution Beach. Section 6.4 of the Supplemental DEIS/FEIR discusses the air quality benefits of the Centerfield Taxiway.
37.66	Alternatives	Taxiway Improvements	The City of Boston believes that possible delays on Echo Taxiway from arrivals on Runway 22L also fail to justify the construction of the Centerfield Taxiway... How many crossing points are required in order for the air traffic controller to have a safe and efficient set of options? Also, what are the environmental benefits related to the Centerfield Taxiway if a pilot enters the Centerfield Taxiway and heads back towards the community seeking a place to cross Runway 22R?	Approximately 75 percent of jet aircraft arrivals exit Runway 22L at Taxiways Papa or Echo, leading to a single crossing point. Runway 27 jet arrivals also must move through this Southwest Corner area. The Centerfield Taxiway will allow aircraft to taxi north to crossing points at Charlie or Foxtrot. The aircraft can then cross at points closer to Terminals C and E without incurring delays in the Southwest Corner or causing increased congestion on Taxiways Alpha and Kilo near Terminals B and C. Allowing aircraft to bypass Southwest Corner and Taxiway Alpha/Kilo congestion will reduce environmental impacts from ground operations, and moving from Taxiway Echo to Taxiway Charlie or Taxiway Foxtrot will not move the impacts significantly closer to the communities.

Code	Topic 1	Topic 2	Comment	Response
37.67	Alternatives	Taxiway Improvements	Massport has listed as one of its criteria for the construction of the Centerfield Taxiway the concern about wing-tip clearance conflicts on Taxiways Alpha (Inner) and Kilo (Outer). Should the Inner Taxiway remain in service subsequent to the construction of the Centerfield Taxiway? What is to prevent this potential conflict from remaining a concern?	Congestion on the Inner and Outer Taxiways is already a problem because pushbacks on Taxiway Alpha can interfere with and delay operations on Taxiway Kilo. As some future aircraft wingspans increase, wingtip clearance may occasionally increase congestion. Taxiway Kilo will still be needed for maneuvering most aircraft past Terminals B and C, since unnecessary runway crossings would have a detrimental impact on airfield capacity.
37.68	Alternatives	Taxiway Improvements	The City questions how the Centerfield Taxiway would enhance the general safety of airside operations, since the dramatic increase in the number of simultaneous aircraft ground movements could increase the potential for ground incursions on Logan's complex taxiway system.	The Centerfield Taxiway will not increase the number of ground operations at Logan Airport. It will simply increase controller flexibility and reduce delays. The number of aircraft on the taxiway system is directly related to the number of flights operating at Logan Airport and will not change because there is another taxiway.
37.69	Alternatives	Taxiway Improvements	Taking into consideration the Centerfield Taxiway length (9,300 feet) and the proposed location, a pilot not familiar with the airport may experience an identification problem while on approach to either 22L or, for small aircraft, 22R.	Practically every major airport with parallel runways (including Logan Airport) also has parallel taxiways. Runway markings, air traffic control procedures, and electronic approach guidance during poor visibility make mistaking taxiway for a runway highly improbable. The Centerfield Taxiway will satisfy all applicable FAA safety regulations regarding its design, construction, lighting, marking, signage, and use.
37.70	Alternatives	Taxiway Improvements	The November Taxiway will remain in operation. Therefore, the City would like to request clarification on how the air quality and noise benefits will be achieved?	While Taxiway November will remain in operation, the larger aircraft that require Runway 22L for departure will no longer need to queue on Taxiway November with the Runway 22R departures, reducing both the number and the size of aircraft using this taxiway.
37.71	Alternatives	Taxiway Improvements	The DEIS/R also claims that the Centerfield Taxiway will reduce delays for aircraft en route to Runways 22R/L for departure. Although this could occur if a minimal number of aircraft are on the field, the City questions how this benefit would be accomplished during peak periods of operation, when the number of aircraft movements on the airfield increases substantially?	Refer to response to Comments 37.64 and 37.68. The number of aircraft on the taxiways is directly related to the capacity of the runway system, since every departing or arriving aircraft must use the taxiway to get to or from the terminal. The Centerfield Taxiway will not change the taxiway demand. The delay benefits will be realized during high demand situations when Runway 22L departures are able to bypass the queue for Runway 22R. Some larger and heavier aircraft (which generally produce more noise and emissions) cannot use Runway 22R for departure but under current conditions must wait in the queue with other departures on Runway 22R, thereby increasing environmental impacts. Even though the queue on Taxiway November is limited to four jets, the heavy jets in this queue produce noise and air quality impacts that could be avoided if they could proceed directly to Runway 22L via the Centerfield Taxiway.
37.72	Alternatives	Taxiway Improvements	If the motivation behind this taxiway is to open gate space by increasing queues on taxiways, allowing Massport to reduce the so-called "delays" occurring now, then this plan is clearly a capacity enhancement program for Logan.	The purpose of the Centerfield Taxiway is not to open gate space, but to reduce taxiing delays and congestion and to provide environmental benefits. The taxiway modeling reflects delays from taxiway congestion and aircraft movements.

Code	Topic 1	Topic 2	Comment	Response
37.73	Purpose and Need	Delay	<p>The City questions Massport's representations of delays...Missing from any discussion or evaluation of delay is the role of other airports in delaying flights destined for Logan and problems with equipment or personnel, both at Logan and other airports....Delays due to cargo and small commercial and private aircraft must be a significant factor in delay. This suggests to us that delay must be evaluated in a regional context as these are the types of flights most easily accommodated at other airports.</p> <p>Future air passenger surveys should include questions about the passenger's origin and the timeliness of the flight(s) leaving the city of origin or that they traveled on prior to reaching Logan.</p>	<p>The Airside Project deals with delays at Logan Airport and the airport's ability to address them; hence delays caused by conditions at other airports, equipment failures, and personnel problems are not relevant nor are they included in the analysis. The delays caused by cargo, general aviation, and commuter aircraft are included in the analysis and the range of the various forecasts encompasses the impacts that may occur from development of and diversion to other airports or regional transportation modes. Chapter 2 of the Supplemental DEIS/FEIR discusses Logan Airport in a regional transportation context. As the second most delayed airport in the nation for arrivals, Massport is trying to reduce its airside-related delay at Logan Airport. Refer to Chapter 1 of the Supplemental DEIS/FEIR for a discussion of Logan Airport delays caused elsewhere in the system.</p>
37.74	Alternatives	Peak Period Pricing	<p>Massport's recommended project alternative does not include peak period pricing.</p> <p>In its analysis of this administrative option, Massport assumes that some existing aircraft operations would be discontinued by a shift to off-peak hours or cancellation of the service altogether. A scenario in which airlines would move service to a regional airport is not mentioned, as if it were not a viable option. Also neglected is a plan in which airlines would continue to offer flights at peak times but would add a surcharge to the fare to make up for the peak assessment. ... Massport's rejection of [the peak period pricing] alternative is unsupported by the arguments outlined in the DEIS/R.</p>	<p>Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport. Regional carriers that provide service between the Cape Cod and Island markets and Logan Airport are not likely to shift these services to other regional airports because doing so would reduce the number of passengers and the economic viability of such services. Regional carriers serving Logan Airport carry a mix of local and connecting passengers. As the largest city in New England, the Boston metropolitan area represents the largest concentration of demand for outlying regional carrier markets.</p>
37.75	Environmental Review Process	Public Process	<p>The City found that the information Massport chose to highlight from two of the cited studies, the SAR (Strategic Assessment Report) and the Second Major Airport Siting Study (SMA), did not fully represent the conclusions of those studies as they would affect Logan. The same is true for the way in which Massport now portrays the motivations for and conclusions of these studies in public Airside Improvements presentations.</p>	<p>Massport disagrees. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR accurately reflect the conclusions of these studies.</p>

Code	Topic 1	Topic 2	Comment	Response
37.76	Purpose and Need	Airfield Capacity	According to the SAR, renewed interest in the long dormant Runway 14/32 proposal grew out of a "Capacity Delay Task Force." But Michael Dawson, a private aviation consultant, in a letter to Massport correcting errors in the report, claimed that the correct name for this group was actually the "Airport Capacity Enhancement Task Force." This is an important distinction, because if Runway 14/32 is in reality a capacity enhancing measure, then the rationale for the runway contradicts Massport's recent statements. It may also violate the Supreme Judicial Court injunction that prohibits the airport's expansion.	<p>The correct title of the report is the <i>Boston Logan International Airport Capacity Enhancement Plan</i>. It documents work by the Boston Airport Capacity Design Team (also referred to as the Task Force) which FAA established as part of its national effort to reduce delays in the NAS. The Task Force included key members from the FAA, Massport, and the airline community. The FAA has sponsored over 30 such teams, which "work to develop a coordinated action plan for reducing airport delay" (refer to Page 15 of the <i>Boston Logan Capacity Enhancement Plan</i>, produced in October 1992 by the FAA). The report recommends ways to accommodate 1992 and projected demand levels with an acceptable level of delay and without compromising safety or the environment.</p> <p>Runway 14/32 would not increase the normal operating capacity of the airport. Logan Airport can currently handle 120 hourly operations, and if the runway is constructed, that will still be the normal capacity throughput. Runway 14/32 enhances operating efficiency by providing a third available runway in weather conditions that require northwest-southeast operations. With a third available runway, controllers are able to segregate large and small aircraft operations, which leads to significant delay reduction benefits. Similar three-runway configurations exist for all other operating directions.</p>
37.77	Alternatives	Peak Period Pricing	Peak hour travel time at Logan is a limited resource. Until Massport and a consortium of other public entities can expand capacity at alternative airports within the region, the immediate solution for relieving delays at Logan is to ration the existing resource through demand management policies.	The Airside Project analysis indicates that PPP is an effective option when airline's schedule beyond the normal hourly operating capacity of the airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
37.78	Alternatives	Demand	The proposed new Runway 14/32 will precipitate increased passenger volumes with consequent increases in vehicle-miles traveled. In the past, Massport has cloaked airside improvements under the veil of improved management of existing aircraft operations. But, clearly, 14/32 is different and will facilitate a new round of added air service and increases in vehicle traffic on the roads, both locally and regionally.	The construction of unidirectional Runway 14/32 would not increase Logan Airport's normal airfield capacity of 120 operations and will not generate additional aircraft operations or passenger traffic. Refer to response to Comment 37.18 and 37.76.
37.79	Alternatives	Peak Period Pricing	Massport claimed that it can seek to remove the injunction against capacity enhancing improvements for "reliever" purposes. If this is actually the case, the City questions why Massport has not pursued demand management policies such as peak hour pricing for relief.	Massport acknowledges the existence of an agreed injunction prohibiting only the completion of a Runway 14/32 concept and certain other airfield improvements proposed in the early 1970s. The express terms of this injunction, however, allow future improvements under certain circumstances, (e.g. changed conditions) or, more generally, if application of the terms of the injunction on a prospective basis is no longer equitable. The Airside Project Feasibility Study, Draft EIS/EIR, and Supplemental DEIS/FEIR examine Logan Airport's current and prospective operating environments and a wide range of alternative improvement concepts, including specifically, PPP. The improvement concepts have been compared to the No Action Alternative. The selection of the Preferred Alternative is based on the operating and environmental analysis set out in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. Massport has not made any claim or assertion to the contrary.
37.80	Alternatives	Runway 14/32	Constructing a new runway is only a short-term approach and will do little to solve the expanding regional transportation issues that must be addressed through a comprehensive, regional, inter/multi-modal solution.	Refer to response to Comment 37.1.

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37.81	Regional Transportation	Regional Airports	<p>Massport claims to be "actively engaged in promoting the use of alternative travel choices to provide relief to Logan." Massport talked about relieving congestion at Logan by expanding use of the state's regional airports in Worcester and New Bedford. Yet, after years of talk and so-called plans, Worcester and New Bedford carry the lowest number of passengers of the eight New England regional airports examined in the Regional Air Service Study. ... There has been no aggressive service development at Worcester, Hanscom or any other regional airport in Massachusetts, even though Massport claims that "The regional alternatives to Logan Airport are an important component of Massport's plan for reducing delays at Logan" (EIS/R 2-48). ... Massport's unsuccessful record in diverting traffic to other airports makes the City doubt Massport's claim of promoting regional alternatives.</p>	<p>Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. Since January 2000 Massport has attracted three new airlines to Worcester Regional Airport. Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta on February 1, 2000 and will be increasing its service to three daily flights in April 2001. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. In February 2001, PanAm began daily scheduled service from Worcester to Orlando International Airport. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in Rhode Island in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives. Massport disagrees that its record in diverting traffic to other airports is unsuccessful. Since 1996 eight out of ten new passengers in New England were directed to regional airports, which include T.F. Green/Providence, Worcester Regional, and Manchester airports. In 1999, Massport estimates that regional airports attracted 2.4 million passengers, that would have otherwise used Logan Airport.</p>

Code	Topic 1	Topic 2	Comment	Response
37.82	Regional Transportation	Regional Airports, Cargo	The City notes that the DEIS/R does not include any discussion of the diversion of cargo to off-airport alternatives and, thus, does not comply with the Secretary's Certificate on the ENF.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act..." Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The potential diversion of cargo operations was not specifically analyzed because cargo operations account for only two percent of aircraft activity at Logan Airport and since most all-cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport. However, all cargo operations were included in the future fleets analyzed in the Airside Project. Additionally, some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and air cargo activity at the regional airports.
37.83	Ground Transportation	Access to Logan Airport	Essential to the success of distributing air traffic within the region is the development of a comprehensive, inter- and multi-modal transportation system. Such a system should address not only the diversion of passengers from air service but should ensure that travelers have convenient vehicular, private and public transit access to regional transportation hubs...in order to minimize air quality impacts, incentives should be offered for the use of alternative fueled vehicles.	The Airside Project does not result in additional demand for ground access services. Massport is working with the MBTA to improve transit access to Logan Airport via the Blue Line and the Airport Intermodal Transit Connector (AITC). Section 2.7 of the Supplemental DEIS/FEIR discusses the proposed MBTA improvements in transit access to Logan Airport. <i>The Logan Airport 1999 ESPR</i> (previously GEIR), filed on December 15, 2000, also reports on the status of these ground transit improvement projects. Section 2.9 of the Supplemental DEIS/FEIR discusses the impact of planned ground access improvement projects at Logan Airport and the regional airports on passenger traffic levels and high-speed rail passenger diversion estimates.
37.84	Analysis Assumptions	Forecasts	The City recommends that data that distinguish between commuter, charter and other regularly scheduled non-commuter flights be part of the evaluation of regional air transit.	All the Airside Project forecasts included activity by segment: Jet, Regional Non-Jet, Charter Jet, Cargo Jet and Non-Jet, and General Aviation Jet and Non-Jet.

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37.85	Regional Transportation	Regional Airports	Hanscom's potential as a regional facility has been ignored in the DEIS/R and should have received substantial attention in the alternatives analysis... Massport has not invested the funds necessary for infrastructure improvements that would attract cargo and regional service...Hanscom could be upgraded into a first-class destination for General Aviation activity with facilities that would entice many private entities to make the switch. In combination with Peak Period Pricing at Logan, Hanscom could well become a convenient option for many travelers. Hanscom could also be developed into a Northeast hub airfield offering service to major destinations such as New York, Washington, D.C., Philadelphia, Pittsburgh, Cleveland and Detroit. ...Developing Hanscom as a feeder facility for flights within the Northeast could result in a reduction in Logan's flight operations significantly. Finally, extending the MBTA's Red Line from Alewife to Hanscom should be considered as an access option as should a connection with the Fitchburg Commuter Rail line that now stops in Lincoln and Concord.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field, consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the <i>Hanscom GEIR</i> (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.
37.86	Regional Transportation	Regional Airports	Although Worcester may not serve as a primary reliever for Logan, it is fundamental that improved access, preferably off Interstate 90, be addressed first and foremost when planning to expand operations at this facility.	MassHighway is analyzing alternative routes that would improve surface access from Routes I-90 and I-290 to the Worcester Regional Airport. MassHighway filed an ENF in December 1999 and is in the process of preparing a Draft EIS/EIR, which is expected to be filed in October 2001.
37.87	Regional Transportation	Regional Airports	The City believes that evaluation of Fort Devens' potential role in a regional transportation system should be assessed.	Fort Devens was an alternative considered as a potential airport site in the Second Major Airport Site Selection study conducted in 1991 by the Massachusetts Aeronautics Commission. However, Fort Devens was not selected. The site has since been developed for other uses. Development at T.F. Green/Providence, Worcester Regional and Pease International Tradeport has superseded the need for a second major airport.
37.88	Mitigation	Initiatives	The DEIS/R, like other Massport project documents, does not adequately address the very real problems and needs of those most affected by airport operations on a daily basis...the quality of life of those who live and work in Logan's zone of impact is clearly not acknowledged.	Massport is committed to a number of mitigation measures in addition to project-specific mitigation. Refer to Chapter 8 of the Supplemental DEIS/FEIR for a discussion of mitigation measures.

Code	Topic 1	Topic 2	Comment	Response
37.89	Open Space/ Parkland	Impacts	The DEIS/R states that, due to the airside improvements project, areas such as parkland, farmland and cultural resources will not receive impacts or will receive insignificant impacts. This is inaccurate and one example is the projected increase in flights over Franklin Park. This parkland is an important resource in a dense urban area populated by many people of color and is on the National Register of Historical Places.	Section 6.3.3 of the Supplemental DEIS/FEIR summarizes the additional analysis of parklands relative to the Preferred Alternative. As depicted in Figure 6.3-4, Franklin Park is well outside the 65 dB Day-Night Sound Level contour associated with the Preferred Alternative. Therefore, the Airside Project will have no impact on this National Register property.
37.90	Analysis Assumptions	Forecasts	<p>The base year in the DEIS/R for modeling and forecasting is 1993, six years ago. Given the changes in fleet mix and other baseline conditions, 1993 is an inappropriate base year.</p> <p>Projections for 1999 are inappropriately called "near-term" rather than "current activity" and the year 2010, only 11 years in the future, is called "long term." The DEIS/R short- and long-term time horizons do not conform with generally accepted planning practices or with FAA standards. The result is an analysis that relies upon outdated information and inadequate forecasting. At a minimum, planning and forecasting for this project should carry through the year 2020.</p>	<p>Consistent with the request made by EOE in its Certificate, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR.</p> <p>Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport is not expected to reach the 29 million passenger forecast presented in the Airside Project Draft EIS/EIR until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport is not expected to achieve the 37.5 million passenger forecasts until 2015, and the 45 million passenger forecasts will not be achieved until 2024. Thus the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a complete discussion of the planning forecasts.</p>
37.91	Purpose and Need	Airfield Capacity	There are questions about Logan Airport's long-term capacity to serve growing air traffic demand in the region, particularly the growing territory beyond Route 128;	With recent service developments, Manchester and T.F. Green/Providence airports, are becoming attractive options for air passengers that originate in communities north and south of Routes I-95 and I-495. By its agreement to assume operational responsibility and the eventual ownership of the Worcester Regional Airport, Massport is working to increase air services at Worcester Regional Airport and is working to increase the airport's role in accommodating air travel demand generated in communities west of I-95 and I-495.
37.92	Ground Transportation	Access to Logan Airport	There are questions about whether already congested urban highways can absorb larger volumes of suburban traffic;	Refer to response to Comment 37.17.
37.93	Ground Transportation	Access to Logan Airport	...commuters who will share the roads with Logan's passengers and residents of surrounding communities who will share the air deserve an accounting of the environmental and economic costs of more traffic congestion and delays on urban roads;	Refer to response to Comment 37.17.

Code	Topic 1	Topic 2	Comment	Response
37.94	Purpose and Need	Delays	There are questions about genuine causes of delays at Logan other than northwest winds, such as the inability of airlines to find attractive alternative airports in the region; if delays actually stem from airlines scheduling far more flights than Logan is capable of handling, then adding capacity will not solve the problem... The only real solution is to improve other airports as more attractive alternatives for the airlines...	Airline services in New England are concentrated at Logan Airport because Boston is the region's most populous city and generates the most air travel demand. The regionalization of aviation in New England is currently underway. In fact, since 1996, eight out of ten new passengers in New England have used the regional airports instead of Logan Airport. Refer to Sections 2.3 through 2.6 of the Supplemental DEIS/FEIR for a discussion of the emerging roles of the Logan, T.F. Green/Providence, Worcester Regional, and Manchester airports in the regional system.
37.95	Alternatives	Peak Period Pricing	There are questions about Logan's high volume of small planes that could be accommodated at smaller, regional airports; some 45% of Logan's flight capacity is planes with 40 passengers or less;... Logan can reduce this percentage through market mechanisms geared to relieve congestion, such as peak pricing;	The Airside Project analysis evaluated PPP as a demand management measure for reducing delays caused by airline overscheduling, such as that experienced at Logan Airport in 1993. Since 1993, regional carriers operations at Logan Airport have declined by 25 percent through market mechanisms without any intervention by Massport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
37.96	Regional Transportation	Regional Airports	There are questions about the suitability of alternative airports or the readiness of alternative regional airports to handle increased traffic and meet demand projections; the effects of physical improvements to existing airports, ground access infrastructure, as well as improvements to Logan Airport need to be studied in a regional context, not in isolation.	Refer to Section 2.9 of the Supplemental DEIS/FEIR for a summary of existing ground access projects that will benefit the regional airports and to Appendix B of the Supplemental DEIS/FEIR for a summary of environmental impacts of the regional airports.
37.97	Regional Transportation	Regional Airports	There are questions about the need to preserve available sites for potential airfields; with Logan at capacity, the state needs to reexamine the suitability of Fort Devens for a new regional reliever airport to serve growing demand along the I-495 and Route 128 corridors;	Refer to response to Comment 37.87. Massport is not aware of any state initiatives to re-examine the suitability of Fort Devens. The development at T.F. Green/Providence and Manchester airports and Massport's role in Worcester Regional Airport have superseded the need for a second airport.
37.98	Regional Transportation	Regional Airports	There are questions about the regional economic benefits of airport expansion and infrastructure improvements at all facilities in the region.	The regionalization of aviation in the eastern Massachusetts, Rhode Island, and New Hampshire region is underway. The T.F. Green/Providence and Manchester airports are experiencing tremendous growth in passenger volume because of the entry and expansion of low fare carriers such as Southwest Airlines, MetroJet, and Delta Express. This strong growth at the regional airports should relieve traffic growth pressures at Logan Airport, both currently and well into the future. On January 15, 2000, Massport assumed the operational control of Worcester Regional Airport, located west of Boston, in an effort to establish a third significant regional airport for accommodating future growth in air travel demand. While these developments are important, improvements at Logan Airport are an equally critical element of the regional transportation strategy and would produce immediate benefits for area travelers. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of the role of options to Logan Airport and steps Massport has taken to foster increased use of these alternatives.
37.99	Purpose and Need	Delays	There are questions about whether prohibiting a new runway at Logan would actually have any undesirable consequences to the efficiency of Logan's operations or the region's economy.	The delay analysis presented in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR clearly indicates that delays will increase in the future if Runway 14/32 is not built. Section 1.2 of the Airside Project Draft EIS/EIR and Section 1.5 of the Supplemental DEIS/FEIR discuss the importance of Logan Airport to the regional economy. Refer also to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of the delays that would occur under future scenarios if no actions were taken, and the delay reduction benefits of the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
37.100	Alternatives	Runway 14/32	The runway is a violation of Massport's commitments that [air] traffic at Logan would not grow.	Massport has made no such commitment. The analysis in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR indicates that with the Preferred Alternative, Massport can accommodate existing and foreseeable future demand efficiently and responsibly.
37.101	Regional Transportation	Regional Airports	The only solution is for the Commonwealth to get serious about a regional solution to a regional problem. The runway is not a regional solution. It is a short-term quick fix for an agency that shows an incredible lack of regional vision. An agency with no long-term plans for what to do after Logan fills up again.	Regional initiatives to improve the efficiency of the region's inter-city transportation network have been studied since 1989. Section 2.9 of the Supplemental DEIS/FEIR summarizes relevant planning studies and their major conclusions. A regional transportation strategy that includes the expansion of regional airports, the development of high-speed rail, and the construction of Runway 14/32 and other infrastructure improvements at Logan Airport has evolved from these important studies. All the major improvements to the regional transportation system have been implemented except for improvements to Logan Airport's airfield. The regional airports have been experiencing tremendous growth in services and passenger traffic since 1996 and Amtrak introduced its high-speed Acela train service between Boston and New York in December 2000. Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. While greater use of the regional airports and high-speed rail will provide relief to Logan Airport, the proposed Airside Project provides clear benefits at current, as well as future, traffic levels. The benefits will only increase in the future, even as regional transportation developments act to reduce the rate of future growth at Logan Airport.
37.102	Regional Transportation	Regional Airports	The Commonwealth could capture economic growth that will be drawn to an alternative airport only if it builds another major airport to serve the region, or expands existing airports like Hanscom Field. Hanscom is in the best position to serve growing businesses along Routes 128 and 495.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields.
37.103	Alternatives	Runway 14/32	A new runway at Logan will only mean more congestion and delays on our highways. Those delays will mean lost time, lost productivity, and a loss of quality of life. ... Adding more traffic to congested highways will only weaken our quality of life—and our regional economic advantage.	The Preferred Alternative is not expected to lead to an increase in passenger demand, and therefore, it will have no effect on congestion or delays on Boston area highways. Refer to section 4.2 of the Supplemental DEIS/FEIR.
37.104	Regional Transportation	Regional Airports	Massport has no serious plans for what to do when Logan reaches its new capacity. And until Massport gets serious about a regional solution to a regional problem, the people of Boston cannot take Massport's commitments seriously at all.	Refer to response to Comment 37.101.

Code	Topic 1	Topic 2	Comment	Response
37.105	Regional Transportation	Regional Airports	The most serious delays at Logan are caused by the lack of attractive alternative airports in greater Boston for airlines and consumers. Without appealing alternative options, more traffic will continue to go to Logan. But Logan can only accommodate so much.	Refer to response to Comment 37.94.
37.106	Ground Transportation	Access to Logan Airport	More traffic at Logan will only mean more cars, trucks and shuttle buses on our congested highways and urban road system.	Refer to section 4.2 of the Supplemental DEIS/FEIR.
37.107	Regional Transportation	Regional Airports	For years, Massport planners have talked about relieving congestion at Logan by building a second major airport or expanding the use of the state's regional airports in Worcester and New Bedford ... Yet, after years of talk and so-called plans, Worcester and New Bedford carry the lowest number of passengers of all of New England's ten largest regional airports.	Refer to response to Comment 37.102.
37.108	Environmental Justice	Impacts	I am concerned that the Massachusetts Port Authority, the US Transportation Department and the FAA Logan Airside Improvements Planning Project, DEIR/DEIS, have not taken into consideration the health of Boston residents in their Logan Airport expansion plan. This is particularly worrisome because of the potential impact on some of the City's most vulnerable subpopulations who are already disproportionately affected by negative environmental factors. Furthermore, the failure to consider such matters appears to be out of compliance with President Clinton's Executive Order 12898.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to Logan Airport.
37.109	Alternatives	Preferred Alternative	The DEIR/DEIS claims that environmental impacts resulting from emissions, noise and odor are negligible or within established state and federal guidelines/ standards. We question this conclusion.	Refer to Section 5.2.4 and Section 5.4.1 of the Supplemental DEIS/FEIR for a discussion of the federal threshold for noise compatibility standards for residential land uses and the state and federal air quality standards. Also, refer to Section 6.2 and Section 6.4 of the Supplemental DEIS/FEIR for a discussion of the noise and air quality impacts, respectively, of the Preferred Alternative relative to federal and state standards.
37.110	Noise	Sound Insulation	The DEIR/DEIS proposes to use soundproofing to mitigate noise impacts in certain neighborhoods. The process of soundproofing residences and businesses can create indoor air quality problems. ... There is no acknowledgement of such secondary impacts in the DEIR/DEIS.	Sound insulation is a widely accepted and popular form of noise mitigation. Neither Massport nor the FAA is aware of secondary impacts that would alter the recommended practice.
37.111	Noise	Studies	Noise and odor impacts have been associated in some studies with decreased learning and increased aggression. In Boston's neighborhoods affected by the redirection and new traffic which will result from this project, decreased learning and increased aggression are issues of concern which should also be addressed.	There is no consensus of these effects within the scientific community. Massport will continue its attempts to reduce instances of highest noise exposure first. The greatest benefit of Runway 14/32 would be the reduction of noise to those most impacted by noise. It would shift 75,000 flights over water, while reducing total number of nighttime flights.
37.112	Public Health	Effects	The BPHC (Boston Public Health Commission) strongly recommends that Massport, the US Transportation Department and the FAA commission the appropriate studies that will document whether or not there are real health impacts on affected Boston neighborhoods associated with the proposed Logan project.	Refer to response to Comment 37.15.

Code	Topic 1	Topic 2	Comment	Response
37.113	Regional Transportation	Regional Airports	There needs to be a regional approach to resolving the current problems at Logan Airport. We firmly believe that the solution to these problems cannot be solved solely by improving conditions only at Logan. ... In our opinion, both the State and Federal governments have the obligation to devise a strategy to encourage and to ensure that a much higher percentage of the burden at Logan is relieved by regional commercial airports.	Since 1990, there have been several studies that have recommended regional initiatives to improve the efficiency of the region's inter-city transportation network. These studies reflect the cooperation of federal, state and local transportation agencies and stakeholders. Section 2.9 of the Supplemental DEIS/FEIR summarizes relevant regional planning studies and their conclusions. All studies have concluded that the Proposed Runway 14/32 and the other airside improvement projects at Logan Airport, along with increased use of the regional airports, including T.F. Green/Providence, Manchester and Worcester Regional airports, and high-speed rail services, are necessary for accommodating the region's future inter-city air travel demand. Refer to discussion of the role of regional alternatives and steps Massport has taken to foster increased use of these alternatives in Chapter 2 of the Supplemental DEIS/FEIR.
37.114	Environmental Review Process	Blue Ribbon Panel	We want to express our support of the proposal of Mayor Menino that an independent commission, or "blue ribbon panel" be established to study objectively the opportunities for regional air traffic improvements and the environmental and economic impact of further expansion at Logan.	Refer to response to Comment 37. 1.
37.115	Regional Transportation	Regional Airports	We support the Mayor's suggestion that a regional New England Port Authority be established to implement a regional transportation strategy, replacing the limited focus of Massport.	This is a matter for the United States Congress and individual state legislatures.
37.116	Regional Transportation	Regional Airports	Regional airports offer a highly feasible resource to attract a large proportion of demand from Logan. Manchester and T.F. Green Airports, for example, already are demonstrating their ability to act as major alternatives to Logan ... We are especially pleased that Massport recently announced plans to take over operations, and eventually ownership, at Worcester Municipal Airport. This is a first step in the right direction to develop a regional solution to Logan's capacity and delay problems. In the meantime, we strongly urge Massport to put the same energy in promoting and developing the use of Worcester as an alternative to Logan as it has in developing the Airside Improvements Project.	Massport considers Logan Airport to be part of a regional system of airports that includes the T.F. Green/Providence, Worcester Regional and Manchester airports. Service developments and increased traffic at these airports are a component of the region's long-term strategy to accommodate passengers and activity growth. By its agreement to assume operational responsibility and the eventual ownership of Worcester Regional Airport, Massport is working to increase air services at Worcester Regional Airport and its role in accommodating air travel demand generated in communities west of I-95 and I-495. Greater use of the regional airports will relieve traffic growth pressures at Logan Airport, but will not eliminate the need for the Airside Project.
37.117	Purpose and Need	Delay	We believe that the delay data and analysis used by Massport to support its proposals, especially the new Runway 14/32, is highly questionable and overstates the actual problem.	The FAA consistently rates Logan Airport as one of the most delay-prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's threshold of 20,000 hours for a severely delayed airport. The FAA Technical Center simulated Logan Airport operations in 1992 and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Supplemental DEIS/FEIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29 M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates with those of the Airside Project modeling. The FAA has concluded that the Airside Project delays represent "a plausible and conservative estimate".

Code	Topic 1	Topic 2	Comment	Response
37.118	Delay	Model	We believe that Massport's analysis basically is flawed for several reasons. First Massport chose to develop its own model. Further, Massport based its model on data from 1993, a peak year for delay at Logan, rather than averaging several years of data. ... FAA statistics on delay at Logan since 1993 have indicated an approximate 19 percent decrease in delays between 1993 and 1998, ... In sum, we feel that the data and methodology used by Massport to calculate existing and future delay do not realistically portray the normal operation of a major U.S. airport and overstate a problem in order to support a pre-conceived program of airside improvements.	Massport developed or modified various models used in this Supplemental DEIS/FEIR to account for truly unique aspects of this project. For example, no other airport in the world has a runway advisory system as sophisticated as PRAS; no other airport in the world has adapted an existing noise prediction model to account for over-water sound propagation (to the extent it is a problem at other locations, it has been ignored); and no other airport in the world has addressed the noise from aircraft taxi movements in as comprehensive a manner as this. The FAA and Massport believe the resulting analyses presented in Chapter 4 of the Supplemental DEIS/FEIR are thus more informative than they would be using only standard models. Separately, the existing environment has been updated in this Supplemental DEIS/FEIR to reflect 1998 operations.
37.119	Noise	Studies	Prior to the construction of the proposed improvements, we recommend that Massport conduct a Federal Aviation Regulations (FAR) part 150 noise compatibility study, which would set forth measures to be taken by Massport to reduce incompatibility in land uses and prevent additional incompatible land uses in the vicinity of Logan Airport.	Massport has implemented numerous noise mitigation measures over the years and continues to pursue a variety of innovative solutions to its noise problems. Massport has no authority to direct land use outside Logan Airport's boundaries.
37.120	Noise	Studies	A Part 150 study, in turn, would trigger an FAR part 161 study for a program of noise abatement and restriction, which could provide for a voluntary control of the number of flights to Logan through agreements between Massport and the airlines serving the airport.	A Part 150 study does not necessarily trigger a Part 161 study. Massport has implemented numerous noise mitigation measures over the years and continues to pursue a variety of innovative solutions to its noise problems.
37.121	Alternatives	Other Non-Construction Alternatives	We believe that limiting or restricting uncontrolled growth of operations at Logan is imperative and could serve as an alternative means to reduce the current and projected future flight delays. ... Eliminating or consolidating flights to provide higher load factors than presently exist would, in turn, not only reduce the number of operations and maximize airline revenue, but also result in delay reduction.	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.
37.122	Noise	PRAS	We feel that a fair and equitable distribution of aircraft operations can be achieved through alternative measures and without the construction of a new runway. We recommend that Massport officials work with FAA tower personnel to examine the PRAS program to determine whether there may be changes to the program that would result in a superior noise abatement policy to that currently in place.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. Unidirectional Runway 14/32 would also give the controllers considerably more flexibility and allow them to improve achievement of PRAS goals, and redirect many flights to overwater routes. During very high demand periods, the controllers currently have little or no flexibility for runway selection. The addition of Runway 14/32 would be the single most important mechanism to achieve equitable geographic distribution of aircraft operations. Massport and the FAA are committed to the PRAS system and have been making improvements since 1982.

Code	Topic 1	Topic 2	Comment	Response
37.123	Alternatives	Runway 14/32, Peak Period Pricing	[In comparing Preferred Alternative 1A vs. Alternatives 2 and 3] [o]nly under the 37.5 million Low Fleet scenario, where non-jet, commuter operations represent a smaller share of the fleet serving Logan, would construction of Runway 14/32 alleviate a greater share of the delay. Thus, if a High Fleet scenario develops at Logan, the construction of Runway 14/32 becomes more of a hindrance and is no longer effective without additional mitigation measures.	Table 4.5-3 in the DEIS shows that the reduction in annual delay hours under the 29 M Low Fleet, 37.5 M Low Fleet, and 29 M High Fleet scenarios would be greater with Runway 14/32 than with PPP. Under the 37.5 M and 45 M High Fleet scenarios, PPP provides a greater delay reduction (Alternative 1A compared Alternative 3) but the percentage delay reduction with the new runway is greater than under each of the Low Fleet scenarios. The results demonstrate that Runway 14/32 would provide benefits under all the future forecasts, while the PPP benefits are much more significant under the High Fleet scenarios than under the Low Fleet scenarios. The results for the new 37.5 M High Regional Jet Fleet in Table 4.7-2 of the Supplemental DEIS/FEIR are similar to those of the Low Fleet scenarios in terms of the relative benefits of the alternatives. Recent history suggests that the Low Fleet forecasts seem to represent the more likely future scenario. If future conditions do trend towards the High Fleet scenarios, the new runway would still provide major delay reductions, and the addition of PPP would further help to reduce delays. This is because the runway would primarily address northwest wind delays; while PPP addresses airline overscheduling with flight cancellations. Additional analysis of PPP is set out in Section 4.5 the Supplemental DEIS/FEIR.
37.124	Regional Transportation	Regional Airports	This analysis also points to another problem. Since the High Fleet assumes a mix with significant regional operations at Logan, an improvement could only occur if there is a substantial transfer of the regional operations from Logan to other airports, as we have recommended above.	<p>The fleet forecasts address a wide range of scenarios, and the High Fleet results seem less probable given current conditions. However, this does not affect the benefits of the proposed runway. Runway 14/32 would reduce delays by at least 27 percent under any of the fleet conditions. In all cases, the delay reduction benefits of the runway would be clearly substantial.</p> <p>Regional carriers are not likely to shift operations to regional airports because doing so would likely reduce on-board passengers and the economic viability of the service. Regional carriers at Logan Airport carry a significant number of local passengers traveling to the City of Boston and passengers connecting to other flights at Logan Airport that are not available from the regional airports. For example, service to Manchester Airport would not be a viable alternative for a Provincetown passenger traveling to a location in downtown Boston. Likewise, regional service to T.F. Green/Providence Airport would not be attractive to a Bangor passenger trying to reach Denver, since there are no nonstop services between Providence and Denver. Additional analysis of PPP is set out in Section 4.5 the Supplemental DEIS/FEIR</p>
37.125	Noise	Runway 14/32	Implementation of Runway 14/32 will result in substantial noise impacts on many of the greater Boston area communities. ...Overall, implementation of Runway 14/32 would widen the scope of communities exposed to noise levels equal to or greater than 65 dB by 2 percent, over the other alternatives.	<p>Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively.</p> <p>Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
37.126	Alternatives	Runway 14/32	It is our understanding that Massport will not agree to any legally binding agreement to maintain the unidirectionality of this runway in perpetuity.	Refer to Section 8.7 of the Supplemental DEIS/FEIR Draft Section 61 Findings, and the discussion in Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.
37.127	Alternatives	Runway 14/32	We also have some concerns with the type of aircraft that would use Runway 14/32. ... It appears that Massport intends greater use of Runway 14/32 for larger jets than it has presented in the Draft EIS/EIR, having categorized the runway as essentially a commuter runway.	Unidirectional Runway 14/32 would be principally used by regional non-jets, general aviation and small jet aircraft capable of landing or taking off in 5,000 feet. Appendix E of the Airside Project Draft EIS/EIR contains the fleet mix for each scenario. Design Category C-III indicates the highest approach speed and widest wingspan of the aircraft to use the runway. Approach Category C includes those with speeds from 121 to 140 knots; Design Group III designates wingspans from 79 to 117 feet. Several of the general aviation and commuter aircraft have approach speeds or wingspans in these ranges.
37.128	Alternatives	Runway 14/32	Although according to Massport the maximum available capacity is 120 operations per hour (with a 3-runway configuration), this capacity is available only about 80% of the year. With Runway 14/32, actual capacity, and thus the number of operations, would increase to more closely approach 100% use.	The availability of unidirectional Runway 14/32 would provide a third runway for use during northwest wind conditions. The runway will not increase the airfield's normal operating capacity of 120 operations per hour and will not generate additional aircraft operations.
37.129	Alternatives	Taxiway Improvements	We seriously question the safety of proposing a taxiway between two busy runways, which we believe could be a problem for a pilot who, on approach to either runway, is not familiar with Logan Airport or when there is extremely low visibility.	Refer to response to Comment 37.69.
37.130	Alternatives	Taxiway Improvements	Since neither the FAA nor Massport would agree to limit the number of aircraft which could use the Centerfield Taxiway, the number of aircraft which could approach this end of the airport would be very high, and would be added to those aircraft using Taxiway November....Since Taxiway November is 3,800 feet in length, the number of aircraft requesting permission to use the Centerfield Taxiway could nearly triple. With a large number of aircraft using the Centerfield Taxiway, there obviously would be a substantial increase in noise, air pollution, and odor impacts on the Bayswater section of East Boston, which is located opposite the proposed alignment of this taxiway. These impacts especially would occur during the summer months, when southwesterly winds are the most common in Boston. Accordingly, we would seriously question Massport's claim to air quality and noise benefits of constructing the Centerfield Taxiway.	The taxiway improvements are designed to improve ground movement efficiency and safety, and to reduce taxiing delays; thereby reducing associated noise and emissions. When using Runways 22L/R for departures, the Centerfield Taxiway would provide an alternate taxi route for Runway 22L departures to bypass the queue for Runway 22R, thereby reducing taxiway congestion and associated noise and emissions. Runway 22L departures represent less than ten percent of the total departures. Under existing conditions, aircraft needing to depart on Runway 22L (typically heavy jets, such as 747s with long takeoff distance requirements) must wait in the queue on Taxiway November with aircraft departing on Runway 22R. With the Centerfield Taxiway, aircraft departing on Runway 22L could depart quickly after reaching the runway end, and the number of aircraft queuing on Taxiway November should decline. Also, the aircraft on the Taxiway November should be smaller, implying lower noise and air quality emissions. With the addition of Runway 14/32, use of Runways 22R and 22L for departures would decline.
37.131	Alternatives	Reduced Approach Minimums	Since arrival is the most difficult and challenging portion of a flight, our safety concerns are based on the premise that the poor weather conditions and reduced visibility, which would trigger the use of these lower landing minima, would only serve to exacerbate a pilot's workload during the landing procedure. With the high number of residents living in close proximity to the touchdown points of these runways, we believe that lowering the safety standards would leave these residents in peril and could result in a tragedy at any time...	Reduced landing minimums provide for a safer approach by providing precision guidance at lower altitudes, and thus a safer approach. The reduced landing minimums do not change the approach path nor reduce the clearance between aircraft and the surface. Rather, they shift the location at which a missed approach decision is initiated closer to the airport. For Runways 27 and 22L, the reduced minimums will make the approach procedures flown by pilots more consistent with FAA standards in effect at most other airports. Reduced landing minimums will increase airfield safety by allowing operations more directly into the prevailing wind and will help improve PRAS goal achievement.

Code	Topic 1	Topic 2	Comment	Response
37.132	Alternatives	Reduced Approach Minimums	We disagree with FAA's assertion that lowering the landing minima would result in noise benefits for the residents living under the approach paths to the subject runways. ... Lowering the landing minima potentially could result in greater use of these runways during poor weather conditions, exposing nearby residents to greater noise levels and more frequent disturbances than they currently experience.	With the proposed reduced minimums, the percentage of equivalent jet arrival operations would decrease by 0.4 percent on Runway 4 and increase by 0.2 percent on Runway 15 and 0.1 percent on Runway 22L. These small increases in arrival operations would not have a measurable effect on the Day-Night Sound Levels under the approaches. Additionally, most of the neighborhoods now exposed to the higher noise levels from power-up would experience reductions up to 10 dB because the proposed reduced minimums would shift the location of the missed approach decision toward the airport beyond most of the neighbors.
37.133	Alternatives	Taxiway Improvements	A number of taxiway improvements also are proposed...in order to reduce taxiway congestion, enhance airfield safety and facilitate operating efficiencies. ... Since these improvements are designed to enhance airfield safety by eliminating confusing or problematic alignments and intersections, we support their implementation at this time.	Comment noted.
37.134	Alternatives	Peak Period Pricing	Massport has eliminated [peak period pricing] based on a claim that airline over-scheduling is not currently a problem at Logan...and is not projected to be a problem in the near future... We do not agree with these conclusions, particularly since the Draft EIS/EIR acknowledges that under long-term High Fleet scenarios "peak period pricing could provide meaningful delay benefits by reducing airline over-scheduling that emerges as a contributor to Logan delays within these flights" (emphasis added).	Refer to response to Comment 37.26.
37.135	Noise	Model	Page 5-34 (top paragraph) – One could question the use of modeled runway use rather than actual effective runway usage in the noise analysis; does this not distort the analysis?	The only way to estimate future noise impacts is by modeling the airfield operations and runway use. The same assumptions used in analyzing the future scenarios were also applied to the analysis for 1993 to demonstrate the effects. The discussion on page 5-34 of the Airside Project Draft EIS/EIR points out the two main differences: (1) runway use in the model is based on the best attempt to meet PRAS goals; (2) year-to-year weather variations are smoothed out by averaging across ten years of Logan Airport weather observations. The 1993 analysis depicts what would have occurred if the Enhanced PRAS had been installed and its recommendations followed that year, and if the weather in 1993 had been the same as the average for 1981-90.
37.136	Ecosystems	Rare Species	Page 5-61 – Construction of the Centerfield Taxiway will displace the nesting sites of the upland sandpiper, a State-listed endangered species. The Massport mitigation plan proposes to relocate these birds off-site to Cape Cod. One could question whether a more local site would be more appropriate.	Refer to response to Comment 37.53.
37.137	Noise	Impacts	Page 6-43 (Tables 6.2-14 and 6.2-15) – The differences between alternatives are not significant or are imperceptible. (Similarly with Tables 6.2-22 to 6.2-29)	Typically, changes in Day-Night Sound Levels of 0 to 2 dB may be perceived and changes of 2 to 5 dB are generally perceived, while changes of more than 5 dB are likely to cause a change in community reaction. By these guidelines, differences between alternatives may be perceived as small, but they occur at the highest exposure levels existing around Logan Airport and are therefore important to mitigate.
37.138	Air Quality	NAAQS	Page 6-82 – 6-83 (Tables 6.3-10 – 6.3-14) – The air quality differences among the alternatives is not significant.	No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.

Code	Topic 1	Topic 2	Comment	Response
37.139	Soil/Sediment	Reuse/ Disposal Options	Page 6-100 (Table 6.6-1) – There are errors in the mean for arsenic, chromium, and lead (see Table 5.6-2, Page 5-74).	There is no error between the two tables. The mean values for the referenced parameters differ only as a result of rounding. The two Governors Island soil characterization tables are not repeated in the Supplemental DEIS/FEIR since that material will be removed from the airfield, as part of an unrelated project, before initiation of any Airside Project construction. Section 5.7.2 of the Supplemental DEIS/FEIR describes that action.
37.140	Construction	Noise	Page 6-117 (Nighttime Construction) – Nighttime construction is scheduled for Runway 14/32, the Centerfield Taxiway, Taxiway November, and possibly elsewhere. The impact on the adjacent East Boston community (Jeffries Point, etc.) needs to be addressed (should construction proceed).	The Supplemental DEIS/FEIR includes an analysis of nighttime construction noise in potentially affected residential areas. All increases in noise associated with construction of the Preferred Alternative improvements are less than 5 dB, the Federal standard for a finding of "no impact". Refer to Section 6.9.4 of the Supplemental DEIS/FEIR.
37.141	Construction	Traffic	Page 123 – Barging, rather than trucking, should be considered for the removal of earth from the airport (also, barging in soil and construction materials) to reduce construction vehicle traffic.	The number of construction vehicles for the Airside Project has been reduced as a result of the reduction in the amount of soil material that will need to be removed from the airport. These construction vehicles represent less than 0.2 percent of the total traffic volume of the regional highway system. All contractors will be required to use designated truck routes. Barging of materials would not be practical since disposal locations for the excavated soil material and existing asphalt to be removed from the site, as well as the sources of paving materials to be brought on-site, will vary and are unlikely to be near coastal waters.
37.142	Errata		Page 8.5 (Figure 8.2-1) – This Figure is incorrect (actually it is the same as Figure 8.2-2).	The correct data for this figure can be found in Table 4.5-1 on Page 4-29 of the Airside Project Draft EIS/EIR.



Charles C. Yancey

Boston City Councillor

April 26, 1999

Mr. Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202

LETTER 38

Dear Secretary Durand:

I am writing to strongly oppose Massport's 14/32 Runway Expansion Proposal.

Massport and the FAA has argued that annual mean levels of carbon monoxide, nitrogen dioxide, particulate matter and volatile organic compounds do not have an adverse air quality impact on the Commonwealth of Massachusetts. But, their detailed analytic data reveal that cumulative noise and ambient contaminants will disparately impact the predominately low-income neighborhoods of Boston. While these impacts have been acknowledged in Chapter 6 of the Draft Environmental Impact Report/Statement (DEIR/DEIS), a regulatory loophole allows Massport not to provide soundproofing within the 65 decibel contour and other mitigation to residential property which do not comply with building code. The Massport expansion and the regulatory loophole are discriminatory. Low income property owners frequently do not have the means to bring their property up to code. Section 8.7 of the DEIR/DEIS offers a dismissive discussion of Airside Project issues relative to environmental justice and compliance with Executive Order 12898. The Commonwealth appears to have no guidance or environmental justice policy, which parallels the Federal Executive Order. However, if your office finds the Logan Expansion adequate, since Massport receives Federal funding, you and your agencies will knowingly violate Title VI of the Civil Rights Act of 1964.

38.1

I believe that the additional burden of any expansion should be equitably distributed and Massport's are not. It is clear that if we build the new runway, we are going to increase traffic on runway 27. Massport has failed to offer mitigations to any burdens that may be placed on community residents in Dorchester, Roxbury, Mattapan, East Boston, the South End, Chelsea, Winthrop and Somerville.

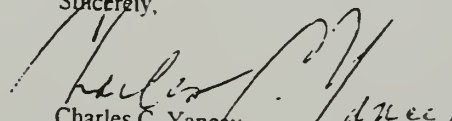
38.2

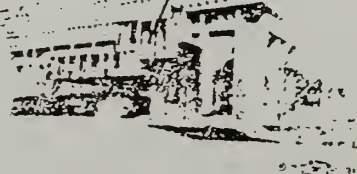
Massport representatives have avoided discussing the failure of their project report to comply with the Environmental Justice's Executive Order and the adverse health additional pollution that a new runway may impose on low-income Boston residents. They only focus on improving tourism and business travel in Boston. We are put in the position of looking as though this is not an either/or decision. From a political and environmental perspective, it should be both.

Region I alternatives to the Massport plan, such as providing incentives to attract air traffic away from Logan Airport to Worcester, Providence, RI, and Manchester New Hampshire, require further analysis.

38.3

Sincerely,


Charles C. Yancey
Boston City Councillor
President, National Black Caucus of
Local Elected Officials



Letter 38

City of Boston

Boston City Councillor Charles Yancey

Code	Topic 1	Topic 2	Comment	Response
38.1	Environmental Justice	Impacts	<p>...[D]etailed analytic data reveal that cumulative noise and ambient contaminants will disparately impact the predominately low-income neighborhoods of Boston. While these impacts have been acknowledged in Chapter 6 of the Draft Environmental Report/Statement (DEIR/DEIS), a regulatory loophole allows Massport not to provide soundproofing within the 65 decibel contour and other mitigation to residential property which do not comply with building code. The Massport expansion and the regulatory loophole are discriminatory. Low income property owners frequently do not have the means to bring their property up to code.</p>	<p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the <i>Logan Airport 1999 ESPR</i> (previously GEIR)). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.</p> <p>Noise was found to be the only adverse impact from the Preferred Alternative with the potential for Environmental Justice impacts. Additional demographic analysis of the noise-affected areas was conducted to determine if minority and/or low-income populations would be disproportionately affected. This analysis found that there is no high and adverse disproportionate impact caused by the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation.</p>

Code	Topic 1	Topic 2	Comment	Response
38.2	Environmental Justice	Impacts	It is clear that if we build the new runway, we are going to increase traffic on runway 27. Massport has failed to offer mitigations to any burdens that may be placed on community residents in Dorchester, Roxbury, Mattapan, East Boston, the South End, Chelsea, Winthrop and Somerville.	<p>The Supplemental DEIS/FEIR indicates that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The PRAS goals were established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations.</p> <p>Chapter 8 of the Supplemental DEIS/FEIR summarizes Massport's proposed project-specific mitigation program associated with the Preferred Alternative including:</p> <p>Runway 14/32 would be designed, constructed, and operated to handle over-water operations only (unidirectional). Massport would seek to construct Runway 14/32 to reflect unidirectional use.</p> <p>To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the <i>Logan Airport 1999 ESPR</i>. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.</p> <p>Section 2.8 of the Supplemental DEIS/FEIR discusses passenger and activity growth at the regional airports and their effect on Logan Airport's projected passenger and activity levels. With regard to ridership projections on Amtrak's high-speed rail, the Airside Project Draft EIS/EIR described in detail the best current information. No updated projections are available. Refer to Appendix B for Amtrak's letter stating that no revised ridership estimates are available.</p> <p>No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.</p> <p>The <i>Logan Airport 1999 ESPR</i> (previously GEIR) reports on Massport's Alternative Fuels Vehicle program and on Massport's efforts to encourage the use of alternative fuel vehicles.</p>
38.3	Regional Transportation	Regional Airports	Region I alternatives to the Massport plan, such as providing incentives to attract air traffic away from Logan Airport to Worcester, Providence, RI, and Manchester, New Hampshire, require further analysis.	<p>Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.</p>



Paul J. Scapicchio ■ Boston City Council

District 1

New City Hall • One City Hall Square • Boston, Massachusetts 02201

617-635-3200

FAX: 617-635-4203

LETTER 39

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
Massachusetts Environmental Protection Agency
100 Cambridge Street, Room 2000
Boston, MA 02202

Dear Mr. Durand,

I am writing to comment on the Draft Environmental Impact Statement/Draft Environmental Impact Report for the Logan Airside Improvements Planning Project as presented by Massachusetts Port Authority in Fenway 1999. I find the DEIS/DEIR to be inadequate and full of shortcomings. It should be rejected as a shortsighted and limited study.

The main thrust of my objection to Massport's DEIS/DEIR is the lack of reasonable alternatives considered in the document as is required by the National Environmental Policy Act. This Act requires the DEIS/DEIR to "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. No Discussion of "alternatives not considered in the DEIS/DEIR" was included. I question whether Massport followed the rules of section 1502.1 and 1502.14, which address alternatives. I have not been informed of "reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment." I am not aware of any alternatives presented in comparative form or rigorously explored and objectively evaluated. Massport did not devote substantial treatment to each alternative considered nor included the alternative of no action. You must not accept a DEIS/DEIR that does not follow the standard format that is required.

There are many other concerns that I have with the document. The airside project and the landside projects at Logan Airport are interdependent, and both will increase capacity and stimulate demand. Yet, Massport wants you to consider landside and airside impacts separately. The cumulative impacts of these projects are immense and must be taken into account. Massport understates these impacts while overstating the delay problems at Logan by using its own model instead of using the FAA approved SIMMOD model for the airport simulation. No data is presented to show recent improvement due to the availability of Enhanced PRAS (EPRAS). In actuality, FAA data on delays shows that the delay situation at Logan has improved since 1993 and is holding steady. The FAA reported delay for 1998 was 18% lower than 1993 levels. This is not reflected in the DEIS/DEIR. This improvement has occurred without any of the airside improvements proposed in this DEIS/DEIR.

39.1

39.2

39.3

39.4

FAA legislation requires that airport sponsors conduct a benefit-cost analysis for capacity-related airport projects. The DEIS/DEIR does not indicate such an analysis. There are also no economic analyses of the noise impacts of the various alternatives. Noise related costs and benefits should be addressed in economic analyses of activities that result in increases or decreases in aircraft noise.

39.5

Furthermore, I have concerns with Massport's guarantee of unidirectional use of runway 14/32. It is clear to me that this commitment is reversible. Massport also reports that the proposed runway will be used only by regional and commuter aircraft. However, large jets such as Boeing 737's, MDC DC-9's, and Airbus A-320's are allowed to use the runway and surely will use it.

39.6

There are unaddressed questions dealing with adverse air quality impacts associated with construction of runway 14/32 and the Centerfield Taxiway. The DEIS/DEIR does not sufficiently explore the odor impacts or the dust problems due to construction of the runway. The proposed airside improvements provide minimal long-term air quality benefits. On the other hand, The Jeffries Point Neighborhood will be adversely impacted by odor from takeoffs.

39.7

39.8

In summary, I must restate my opposition to the Logan Airside Improvements Project and ask that you judge the DEIS/DEIR to be inadequate and removed from further consideration due to its deficiencies. There is no plan or program to deal with long term growth at Logan Airport. There are measures that could be instituted to effectively address transportation in Eastern New England, but there is no discussion in this document. There must be a plan and a program to shift some current and future air traffic and passengers from Logan. Major expansion of service at and capacity of other Airports must be undertaken. The ENF Certificate dated November 22, 1995 cited that "the alternatives analysis must be broadened to include off-airport alternatives". Although Massport includes some off-airport options, the development of other obvious alternatives has not been reasonably discussed nor have the reasons for their elimination as options.

Thank you for your consideration to this important matter.

Sincerely

Paul Scapicchio

Paul Scapicchio

Letter 39

City of Boston

Boston City Councillor Paul J. Scapicchio

Code	Topic 1	Topic 2	Comment	Response
39.1	Environmental Review Process	NEPA	...my objection to Massport's DEIS/DEIR is the lack of reasonable alternatives considered in the document as is required by the National Environmental Policy Act. This Act requires the DEIS/DEIR to "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. No Discussion of "alternatives not considered in the DEIS/DEIR" was included. I question whether Massport followed the rules of section 1502.1 and 1502.14, which address alternatives.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's <i>Logan Capacity Enhancement Plan</i> (October 1992); the <i>Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study</i> (December 1993); the <i>Logan Final GEIR</i> (July 1993); and the <i>Logan Airside Improvements Feasibility Study, Phase 1 Report</i> , published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its <i>Boston Logan International Airport Capacity Enhancement Plan</i> . The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the <i>Logan Airside Feasibility Study</i> , published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
39.2	Cumulative Impacts	Landside Improvements	The Airside Project and the landside projects at Logan Airport are interdependent, and both will increase capacity and stimulate demand...The cumulative impacts of these projects are immense and must be taken into account.	Environmental and health issues within the City of Chelsea were considered in an effort to assess other cumulative or multiple adverse exposures. Refer to Section 6.8.6 of the Supplemental DEIS/FEIR for additional information.
39.3	Delay	Model	Massport understates these impacts while overstating the delay problems at Logan by using its own model instead of using the FAA approved SIMMOD model for the airport simulation.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Section 1.4 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
39.4	Delay	Model	No data is presented to show recent improvement due to the availability of Enhanced PRAS (EPRAS). In actuality, FAA data on delays shows that the delay situation at Logan has improved since 1993 and is holding steady. The FAA reported delay for 1998 was 18% lower than 1993 levels. This is not reflected in the DEIS/DEIR.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (i.e., all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p> <p>Section 1.4 and Appendix C of the Supplemental DEIS/FEIR contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. The delay situation is not at equilibrium. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994. In fact, Logan Airport is the second most delayed airport in the nation for arrivals.</p>
39.5	Environmental Review Process	NEPA/FAA	FAA legislation requires that airport sponsors conduct a benefit-cost analysis for capacity-related airport projects. The DEIS/DEIR does not indicate such an analysis [was completed]. There are also no economic analyses of the noise impacts of the various alternatives. Noise related costs and benefits should be addressed in economic analyses of activities that result in increases or decreases in aircraft noise.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives.</p> <p>According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis "for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..."</p>

Code	Topic 1	Topic 2	Comment	Response
39.6	Alternatives	Runway 14/32	Furthermore, I have concerns with Massport's guarantee of unidirectional use of Runway 14/32. It is clear to me that this commitment is reversible. Massport also reports that the proposed runway will be used only by regional and commuter aircraft. However, large jets such as Boeing 737s, MDC DC-9s, and Airbus A-320's are allowed to use the runway and surely will use it.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p> <p>Unidirectional Runway 14/32 would be principally used by regional non-jets, general aviation and small jet aircraft capable of landing or taking off in 5,000 feet. Appendix E of the Airside Project Draft EIS/EIR contains the fleet mix for each scenario. Design Category C-III indicates the highest approach speed and widest wingspan of the aircraft to use the runway. Approach Category C includes those with speeds from 121 to 140 knots; Design Group III designates wingspans from 79 to 117 feet. Several of the general aviation and commuter aircraft have approach speeds or wingspans in these ranges.</p>
39.7	Construction Period	Mitigation	There are unaddressed questions dealing with adverse air quality impacts associated with construction of Runway 14/32 and the Centerfield Taxiway. The DEIS/DEIR does not sufficiently explore the odor impacts or the dust problems due to construction of the runway. The proposed airside improvements provide minimal long-term air quality benefits.	<p>Massport will require contractors to retrofit their heavy construction equipment with advanced pollution control devices in accordance with DEP's Clean Air Construction Initiative. Contractor owned equipment, such as front-end loaders, backhoes, cranes and excavators, will be retrofitted with oxidation catalysts to filter and break down hydrocarbons, particulate matter and carbon dioxide from diesel emissions. Refer to Section 6.9.4 of the Supplemental DEIS/FEIR for additional discussion of air quality mitigation measures during the construction period.</p> <p>As stated in Section 6.9.4.2 of the Supplemental DEIS/FEIR, Massport is committed to implementing the Clean Air Construction Initiative in cooperation with MADEP and Northeast States for Coordinated Air Use Management (NESCAUM). Furthermore, construction will conform to FAA AC 150/5370-10A, <i>Standards for Specifying Construction of Airports</i>.</p> <p>Construction-period air quality impact mitigation will include the steps specified in FAA Advisory Circular 150/5370-10A, <i>Standards for Specifying Construction of Airports</i>. These and other measures are listed in Section 8.5.2 of the Supplemental DEIS/FEIR.</p>

Code	Topic 1	Topic 2	Comment	Response
39.8	Air Quality	Odor	The Jeffries Point Neighborhood will be adversely impacted by odor from takeoffs.	One-hour VOC concentrations (used as an indicator of odor) increase only slightly at Jeffries Point with the Preferred Alternative, when compared to the No Action Alternative. The predicted increase is so small that changes in odor will remain imperceptible, as measured against the No Action Alternative. Concentrations decrease at all other receptors with the Preferred Alternative.



BARNSTABLE MUNICIPAL AIRPORT-----

BOARDMAN-POLANDO FIELD
480 BARNSTABLE ROAD, 2ND FLOOR
HYANNIS, MASSACHUSETTS 02601
(508) 775-2020

FAX: (508) 775-0453

LETTER 40

The members of the Barnstable Municipal Airport Commission would like to express their support for the construction of runways 14-32 at Logan International Airport.

We recognize that many untrue and half-true statements have made headlines recently concerning this project. We wish to comment on just few of them.

The first is "NOISE" pollution. This runway cannot possibly generate any additional noise, as it is a completely over-the water approach. It may in fact reduce the existing noise generated both in the air by circling traffic and on the ground by planes waiting for departure clearance. 40.1

Then there is talk that "DELAYS" at Logan should be controlled by a device called "PEAK PERIOD PRICING." This policy would increase landing fees for all carriers wishing to use the airport at "Certain" times, when in fact, the problem is not timing but a wind/weather situation which can occur at any time. When the wind goes to the Northwest, Logan International Airport needs two runways, not one, as is the current status. This runway will be a unidirectional runway. For use only when the winds make it the safe second runway. 40.2

The residents of Cape Cod rely heavily on our Airport to get them where they need to be in an efficient manner. Logan is their departure point of choice. They are still going to go there for their through flights. If air travel is to be restricted between Barnstable and Logan during "Peak" times, then our residents will choose to be either driven to or will drive to the airport themselves. Has the impact of the additional vehicular traffic been considered? Will additional parking facilities be constructed? 40.3

Cape Cod is not the only area in the state that will be affected.

We see this runway not as the end of the story, but a first chapter in the regionalization process which is being discussed. Give the airport the safety of a second northwest runway, while alternatives for greater dispersion of traffic can be explored.

Please support this construction project.

Thank you.

Katherine A. Strojny, Chairman, Barnstable Municipal Airport Commission
Phillip R. Doherty, Vice Chairman, Clerk
William Elkins, Commissioner
Edwin A. Gourley, Commissioner
John A. Lemos, Commissioner
David A. Barber, Commissioner
John T. Griffen, Jr. Commissioner

4/21/99

Letter 40

Town of Barnstable Municipal Airport Commission

Katherine Stronjy, Chairman

Code	Topic 1	Topic 2	Comment	Response
40.1	Noise	Runway 14/32	This runway cannot possibly generate any additional noise, as it is a completely over-the-water approach. It may in fact reduce the existing noise generated both in the air by circling traffic and on the ground by planes waiting for departure clearance.	Comment noted.
40.2	Alternatives	Peak Period Pricing	... "PEAK PERIOD PRICING" ... would increase landing fees for all carriers wishing to use the airport at "Certain" times, when in fact, the problem is not timing but a wind/weather situation which can occur at any time.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.</p> <p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>
40.3	Alternatives	Peak Period Pricing	The residents of Cape Cod rely heavily on our Airport to get them where they need to be in an efficient manner. Logan is their departure point of choice. They are still going to go there for their through flights. If air travel is to be restricted between Barnstable and Logan during "Peak" times, then our residents will choose to be either driven to or will drive to the airport themselves. Has the impact of the additional vehicular traffic been considered? Will additional parking facilities be constructed?	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p>





OFFICE OF THE CITY CLERK

CITY OF CAMBRIDGE

(617) 349-4260

FAX (617) 349-4307

tty/TDD (617) 492-0235

LETTER 41

D. MARGARET DRURY
CITY CLERK

DONNA P. LOPEZ
DEPUTY CITY CLERK

April 9, 1999

Mr. Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
20th Floor
Boston, MA 02202

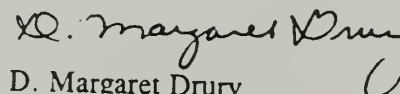
Dear Mr. Durand:

Pursuant to the request of the Cambridge City Council, I am forwarding to you the enclosed resolution submitted by Councillors Kathleen Born and co-sponsored by the entire membership. The resolution expresses the opposition of the City of Cambridge to the proposed Runway 14/32 at Logan Airport, and is intended to be considered as part of the MEPA comment process.

As you will note, all members present were unanimous in their support of this resolution.

Thank you for your attention in this matter.

Very truly yours,


D. Margaret Drury
City Clerk

DMD/mc

Enclosure



City of Cambridge

40.

IN CITY COUNCIL

April 5, 1999

COUNCILLOR BORN
COUNCILLOR DAVIS
MAYOR DUEHAY
VICE MAYOR GALLUCCIO
COUNCILLOR REEVES
COUNCILLOR RUSSELL
COUNCILLOR SULLIVAN
COUNCILLOR TOOMEY
COUNCILLOR TRIANTAFILLOU

- WHEREAS: The construction of Runway 14/32 at Logan Airport would lead to an intolerable increase in noise and pollution for neighboring communities such as Cambridge because of the increased volume of flights it would allow; and 41.1
- WHEREAS: Its construction would lead to a 300% increase in departures using Runway 33L, which fly over Cambridge and Somerville; and
- WHEREAS: The proposed runway is a short-term short-sighted fix to the problem of delays at Logan; Massport admits that the delays will return to current levels within five years of the construction of Runway 14/32; what is needed is a realistic, long-term, regional aviation plan for New England; and 41.2
- WHEREAS: There has been a dearth of opportunities for public participation in this issue; Massport has refused to come to a meeting of the Cambridge City Council or to schedule its own public meeting in Cambridge; now therefore be it 41.3
- RESOLVED: That the Cambridge City Council go on record joining the governing bodies of Boston, Chelsea, Winthrop and Somerville in opposing this runway because of the negative effects it will have on the health and quality of life of our citizens; and be it further 41.4
- RESOLVED: That the City Clerk forward a suitably engrossed copy of this resolution to Robert Durand, Secretary of Environmental Affairs, prior to April 20, 1999, which is the end of the MEPA comment period and to John C. Silva, Manager of Environmental Programs for the Federal Aviation Administration.

In City Council April 5, 1999.

Adopted by the affirmative vote of nine members.

Attest:- D. Margaret Drury, City Clerk.

A true copy;

ATTEST:-

D. Margaret Drury
D. Margaret Drury, City Clerk

Letter 41

City of Cambridge, City Council

D. Margaret Drury, City Clerk

Code	Topic 1	Topic 2	Comment	Response
41.1	Noise	Runway 14/32	The construction of Runway 14/32 at Logan Airport would lead to an intolerable increase in noise and pollution for neighboring communities such as Cambridge because of the increased volume of flights it would allow.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.</p> <p>The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.</p>
41.2	Alternatives	Runway 14/32	The proposed runway is a short-term short-sighted fix to the problem of delays at Logan; Massport admits that the delays will return to current levels within five years of the construction of Runway 14/32; what is needed is a realistic, long-term, regional aviation plan for New England....	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented, the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
41.3	Environmental Review Process	Public Process	...Massport has refused to come to a meeting of the Cambridge City Council or to schedule its own public meeting in Cambridge....	Since the initial scoping, FAA and Massport have established a dialogue with the Airside Review Committee, community leaders and the public through hearings, briefings, and circulation of over 700 copies of the Airside Project Draft EIS/EIR for comment. At public meetings and at the request of interested community members, Massport has provided the public full access to information about the Airside Project and its associated social and environmental effects.
41.4	Alternatives	Runway 14/32	...Cambridge City Council... [opposes] this runway because of the negative effects it will have on the health and quality of life of our citizens....	<p>The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.</p> <p>The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative.</p>





EXECUTIVE DEPARTMENT
ROBERT W. HEALY
City Manager

CITY OF CAMBRIDGE
CAMBRIDGE, MASSACHUSETTS 02139

TEL 349-4300
FAX 349-4307



LETTER 42

RICHARD C. ROSSI
Deputy City Manager

April 20, 1999

Mr. Robert Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley, EOEA No. 10458
100 Cambridge Street - 20th Floor
Boston, MA 02202

Mr. John Silva
Federal Aviation Administration
New England Region Headquarters
12 New England Executive Park
Burlington, MA 01803

Dear Sirs:

Each year, I receive numerous complaints from residents about noise from commercial airplane flights over Cambridge. Therefore, I must object to any expansion or operational changes at Logan Airport that would result in more planes flying over our city.

Runway 33L is the one that most affects Cambridge. I understand that this runway must be used during periods when strong winds are blowing from the northwest but I am concerned that construction of runway 14-32 would greatly increase the number of flights using runway 33L. According to Massport, their current goal is for this runway to be used about 12 percent of the time but in actuality it is used only a little over 5 percent of the time. With the construction of runway 14-32, runway 33L is projected to be used between 26 and 43 percent of the time. This will severely increase the noise impacts on Cambridge residents.

Massport has stated that although the number of flights over Cambridge will increase, the number of nighttime flights will be reduced. Currently, Massport operates Logan with two basic runway configurations, one in a general north/south direction using three runways, and the other in a general east/west direction but with only two runways, including runway 33L. Because of the capacity constraints on the two runway configuration, the three runway configuration is used in peak demand periods unless there are heavy winds from the northwest.

In order to try and balance the total flights over all communities, Massport uses runway 33L more often at night and on weekends because there are fewer flights which can be accommodated by using only two runways. With the addition of runway 14-32, there

42.1

will be three runways for the east/west configuration resulting in an increase in capacity to that of the north-south three runway configuration. Therefore, some of the current night and weekend flights over Cambridge will move to the north-south configuration and some of the daytime flights will move to the east/west configuration. This is intended to better balance the impact among all communities. What guarantees are in place to make sure this will happen? While the proposed runway changes are designed to reduce impacts on the communities both north and south of Logan, they do not appear to be embraced by most communities, including East Boston, Hull and Winthrop.

42.2

Massport has abandoned the idea of charging higher landing fees during peak demand periods because of the financial impact on the regional carriers that use small planes and thus have fewer passengers to share in the cost. This position should be reconsidered since the result would be to move some flights to the off-peak periods and/or move some of the carriers to the other regional airports in Manchester, Providence and potentially Worcester. The result would be to reduce airplane noise in Cambridge and other communities currently impacted.

42.3

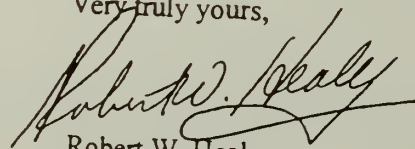
Massport has based the need for runway 14-32 on the desire to reduce the amount of airplane delay which they say is 120,000 hours per year (sixth highest in the country). Massport's Community Advisory Committee (CAC) and others have questioned that data. Massport itself has indicated that by the year 2010 delays will increase by 39,000 hours annually even with the new runway.

42.4

I am therefore requesting that Massport be instructed to resolve the issue of how much airplane delay is actually occurring at Logan before deciding on what improvements, if any, should be made. In addition, Massport should be instructed to reopen the issue of peak period pricing and any other operational changes the could reduce the need for new runways.

Thank you for the opportunity to comment on this project.

Very truly yours,



Robert W. Healy
City Manager

Cc: Beth Rubenstein, Acting Assistance City Manager
for Community Development

Letter 42

City of Cambridge

Robert W. Healy, City Manager

Code	Topic 1	Topic 2	Comment	Response
42.1	Alternatives	Runway 14/32	Runway 33L is the one that most affects Cambridge...I am concerned that construction of Runway 14/32 would greatly increase the number of flights using runway 33L...With the construction of Runway 14/32, runway 33L is projected to be used between 26 and 43 percent of the time. This will severely increase the noise impacts on Cambridge residents.	<p>The Supplemental DEIS/FEIR indicates that the Preferred Alternative promote runway use in a manner that is more consistent with annual PRAS goals. The PRAS goals were established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations.</p> <p>Total departures from Runway 33L would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below, the annual goals for these operations.</p>
42.2	Alternatives	Runway 14/32	With the addition of Runway 14/32, there will be three runways for the east/west configuration resulting in an increase in capacity to that of the north-south three-runway configuration. Therefore, some of the current night and weekend flights over Cambridge will move to the north-south configuration and some of the daytime flights will move to the east/west configuration...What guarantees are in place to make sure this will happen?	<p>The FAA assigns the runways to be used for takeoff and landing using standard operating procedures that take into account wind, weather, traffic demands, PRAS recommendations and other factors. Modeling these conditions into the future requires knowledge of historical trends and predictions of future activity, and if those factors unfold as they have in the past, the projections are likely to occur as expected. However, the control of air traffic is a dynamic process and there are no guarantees or safeguards that the predictions will occur exactly as modeled.</p>
42.3	Alternatives	Peak Period Pricing	Massport has abandoned the idea of charging higher landing fees during peak demand periods because of the financial impact on the regional carriers that use small planes and thus have fewer passengers to share in the cost. This position should be reconsidered since the result would be to move some flights to the off-peak periods and/or move some of the carriers to the other regional airports in Manchester, Providence and potentially Worcester. The result would be to reduce airplane noise in Cambridge and other communities currently impacted...Massport should be instructed to reopen the issue of peak period pricing and any other operational changes that could reduce the need for new runways.	<p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.</p> <p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the <i>Logan Airport 1999 ESPP</i> (previously GEIR)). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.</p>

Code	Topic 1	Topic 2	Comment	Response
42.4	Alternatives	Runway 14/32	<p>Massport has based the need for Runway 14/32 on the desire to reduce the amount of airplane delay which they say is 120,000 hours per year (sixth highest in the country). Massport's Community Advisory Committee (CAC) and others have questioned that data. Massport itself has indicated that by the year 2010 delays will increase by 39,000 hours annually even with the new runway...I am therefore requesting that Massport be instructed to resolve the issue of how much airplane delay is actually occurring at Logan before deciding on what improvements, if any, should be made.</p>	<p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.</p> <p>Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Section 1.4 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.</p>



City of Chelsea

Guy A. Santagate, City Manager
City Hall
500 Broadway
Chelsea, Massachusetts 02150



LETTER 43

April 23, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02202

Dear Secretary Durand:

I would like to thank you for this opportunity to comment on the proposed Logan Airside Improvements Project, EOE #10458. As the Chelsea City Manager, I am pleased to offer the following comments on behalf of Chelsea City Government and all of the residents of the City of Chelsea.

To help define the City's position on the addition of another runway at Logan, the City believes the focus belongs on the rights of airline passengers versus airport neighbors. In particular, we would respectfully ask those reviewing the runway expansion project if relieving the minutes of inconvenience caused to airline passengers at Logan should override the negative impacts such a tremendous increase in daily flight operations will have on the 30,000+ residents of Chelsea and others so impacted?

Having framed the question, some may answer yes. An argument may be made, I suppose, that the on-time shuttle of passengers and cargo to and from Logan Airport is so vital to the region's economic well-being that hundreds of thousands of people should suffer a deterioration in their quality of life for the benefit of the greater good. We in Chelsea are certainly very aware of that type of thinking. After all, Chelsea is host to a significant portion of the region's petroleum supply, as well as the region's largest salt pile and most important bridge. Additionally, thousands of trucks and millions of gallons of sewage a day can be found on and under our street network. The cumulative impact in the name of the greater good has already caused the most densely populated community in the commonwealth to suffer dramatically.

Yet, through it all, Chelsea has finally gained its stride after decades of missteps and at last appears to be on the verge of the revitalization for which generations have longed. We have learned to live with the problems being the regional solution to so many issues have posed, and through it all, we are achieving much despite the reduction in quality of life we suffer because of the burdens we bear. However, our capacity to absorb additional impacts and maintain an acceptable quality environment for our residents to enjoy and our businesses to thrive is central to the Logan expansion debate. We fear the

Robert Durand, Secretary
April 23, 1999
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re: Logan Airside Improvements Project, EOE A #10458

impacts, both real and perceived, from what is to be an incredible increase in airport operations and related support activities under the Logan AIP.

43.1

Of course, we realize if Logan Airport was the average size airport in the country by landmass, all of Chelsea would be on-airport. Yet, those pushing an expansion agenda need to realize that those sprawling airports are not often located in such densely populated neighborhoods as those surrounding Logan. By some estimates, Logan's capacity to generate additional passenger and cargo activity appears to be almost unlimited. At some point, however, the reversal in the quality of life caused by the absorption of that capacity begins to outweigh the supposed greater good achieving those numbers can produce.

From the passenger perspective, that which I am most familiar, the traveling public is so use to delays and inconveniences that many of us now build in extra time and bring along extra patience to deal with the problem. Certainly delay-free travel is a goal worthy of pursuit, however we cannot let the pursuit of the goal override a more fundamental goal we must all strive to realize: The peaceful and healthy enjoyment of one's neighborhood and home. It is this last point that brings us back to Chelsea.

Unfortunately, environmental justice is a concept we are just becoming familiar with in Chelsea. The odors have seemingly always been there. Now, however, we are learning about the high levels of VOCs in the emissions of the petroleum operations, the cyanide in the salt that blows off the piles and into our neighborhoods, and the particulates that thousands of diesel trucks and more than 100,000 cars a day traveling over the three Chelsea bridges into Boston are adding to our environment. With several of our industrial operations on the list of top dischargers of solvents, and being downwind of the Exxon Terminal in Everett and Site Energies in Charlestown, Chelsea's statistically significant levels of respiratory cancers and other ailments may indeed be a result of the pollution corridor in which we are located.

It is by no coincidence that Chelsea has systematically enticed the middle and upper-middle class back to our community. I take very serious, though, the threats of many in those socio-economic categories that the addition of the runway means the end of their investment in Chelsea. Of course, those people have the means to make such a decision, no matter how devastating another flight of the middle class would be on our schools, civic institutions, political leadership, neighborhood stability and so much more. It is those of lesser means, though, the first and second generation immigrants and longer residents who have not found themselves a position on the corporate ladder of success that will again be left behind. Those who cannot afford to escape the environment

Robert Durand, Secretary
April 23, 1999
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re: Logan Airside Improvements Project, EOE #10458

around them will once again bear the same types of impacts brought to the city by the petroleum industry in the 1930's, the Tobin Bridge in the 1950's and the salt pile in the 1970's.

Chelsea has done its part and continues to work with the Massachusetts Port Authority to improve efficiencies at Logan Airport. We have become home to many of the freight forwarders who once populated Logan Airport, and we have developed a district that allows other support services to locate off-airport. We certainly understand the need for the region's largest economic engine to continue to spin-off the jobs and services that make Greater Boston one of the most attractive areas to live and work. However, like any good thing taken to the extreme, we remain concerned that the expansion of Logan Airport, without serious consideration and resolution of the tremendous impacts such an expansion will have on the residents of Chelsea and our fellow neighbors so situated, is unwarranted. To date, we have not seen a comprehensive plan that provides us with the necessary comfort level to believe that the noise, traffic and health impacts of the Logan expansion will be mitigated in our community. Of course, our suspicions are reflective of the lack of action that has taken place to solve the impacts we already have in our community. The city has not seen any soundproofing activity in more than a decade, the trucks keeping rolling through our community at greater levels and our insistence that our residents may suffer short- and long-term health problems as a result of so many noxious activities receives little attention.

43.2

Perhaps Logan has already reached its capacity to serve the region. The regional significance of more passengers and more cargo requires regional solutions, but in this case, it appears that Logan expansion proponents are suggesting that Logan is the only answer. The City believes otherwise. The regional discussion needs to not only include airports and highspeed rail, but must also question where, in a world that continues to grow smaller, does Logan's role as a cargo facility go into the future. Before committing to a new runway at the expense of the neighborhoods that have long existed before Logan appeared, we should have a more in-depth long-range plan to manage growth. While the cost of the alternatives and the impact of limiting growth may be substantial, so too is the impact on those who will bear the brunt of the negatives that the new runway could bring. In light of seeking a relevant framework for discussion, we must also question the validity of the dated data presently being used to determine both the so-called delays and the relief being offered by the Logan AIP.

43.3

43.4

Most importantly, we certainly feel Logan has exceeded its ability to call upon its neighbors to sacrifice any more. Never again should a television need to be turned up, an outdoor conversation need to be interrupted or a car alarm set off because

Robert Durand, Secretary
April 23, 1999
Page 4

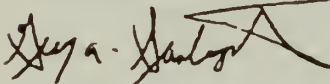
re: Logan Airside Improvements Project, EOE #10458

a plane is flying overhead or an air freight truck is rumbling by. Gone forever should be the harmful fumes that find their way down from the skies and into our bodies. Perhaps policy officials should consider mitigating the existing impacts before creating even more like those the Logan AIP will undoubtedly create.

43.5

Again, on behalf of the City of Chelsea and all its residents, we greatly appreciate your review of the factors I have raised and others being raised by concerned citizens, business officials and elected and appointed leaders alike. Chelsea is eager to see the discussion on alternatives begin, and therefore hopes your review will cause our questions and others to be thoroughly investigated and acted upon.

Very truly yours,



Guy A. Santagate
City Manager

cc: James Wickersham, MEPA Unit
Senate President Thomas Birmingham
Representative Eugene O'Flaherty
Congressman Michael Capuano
Chelsea City Council members

Letter 43

City of Chelsea

Guy A. Santagate, City Manager

Code	Topic 1	Topic 2	Comment	Response
43.1	Alternatives	Runway 14/32	We fear the impacts, both real and perceived, from what is to be an incredible increase in airport operations and related support activities under the Logan AIP.	<p>Refer to response to Comment 85.4. The Preferred Alternative will not create additional passenger demand or flight operations at Logan Airport. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. Instead, Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.</p> <p>The runway will substantially reduce delays that occur during northwest wind conditions. Preventing these delays will represent a real benefit to the passengers and airlines that currently experience them. However, because these wind conditions and the associated delays are not regular or predictable and cannot be readily anticipated, it is not expected that their prevention will stimulate growth in Logan Airport passenger demand above and beyond the rates that would have occurred absent the runway. Instead, growth in Logan Airport passenger demand will be principally driven by local and national economic conditions, competition and pricing within the airline industry, and the distribution of airline services and passenger traffic between Logan Airport and the surrounding regional airports. The broad range of forecasts considered in the Airside Project operational and environmental analyses capture any potential variation in future passenger and aircraft activity at Logan Airport. The environmental impacts associated with these alternative forecasts have been evaluated in the Airside analysis and GEIRs.</p>
43.2	Alternatives	Runway 14/32	...we remain concerned that the expansion of Logan Airport, without serious consideration and resolution of the tremendous impacts such an expansion will have on the residents of Chelsea and our fellow neighbors so situated, is unwarranted. To date, we have not seen a comprehensive plan that provides us with the necessary comfort level to believe that the noise, traffic and health impacts of the Logan expansion will be mitigated in our community.	<p>Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively.</p> <p>Refer to Section 6.2.5 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR. The Preferred Alternative is not expected to lead to an increase in passenger demand, and therefore, it will have no effect on congestion or delays on Boston area highways. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.</p>

Code	Topic 1	Topic 2	Comment	Response
43.3	Regional Transportation	Cargo	...The regional significance of more passengers and more cargo requires regional solutions...The regional discussion needs to not only include airports and high-speed rail, but must also question where, in a world that continues to grow smaller, does Logan's role as a cargo facility go into the future. Before committing to a new runway at the expense of the neighborhoods that have long existed before Logan appeared, we should have a more in-depth long-range plan to manage growth.	<p>Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.</p> <p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act..." Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Secretary of Environmental Affairs' Certificate on the ENF directed Massport to "discuss [these] off-airport alternatives and analyze the potential each has to divert passengers and/or cargo from ... Logan Airport." Cargo operations were not specifically analyzed because they account for only two percent of aircraft activity at Logan Airport and since most all cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport.</p>
43.4	Delay	Model	...[W]e...also question the validity of the dated data presently being used to determine both the so-called delays and the relief being offered by the Logan AIP.	<p>The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.</p>
43.5	Mitigation	Initiatives	...policy officials should consider mitigating the existing impacts before creating even more like those the Logan AIP will undoubtedly create.	<p>Refer to the <i>Logan Airport 1999 ESPR</i> (previously GEIR) for the status of Massport's mitigation programs and to Chapter 8 of the Supplemental DEIS/FEIR for a discussion of proposed Airside Project mitigation measures.</p>

April 8, 1999

LETTER 44

To Whom It May Concern:

The majority and the focus of my presentation today will address the inconstancies and inadequacies of the proposal before us as they relate to the City of Chelsea. I will, before the April 23rd deadline, submit a more comprehensive written comment.

First, I'd like to address the issue of the noise impact assessment. In order to go forward, it is necessary to look back. I first started examining the noise contour shortly after I bought my home in the Historic Waterfront District in 1996. After becoming elected to represent District 8, one of the communities that will be most heavily impacted if this proposal is ^{the} authorized, I had the opportunity to attend a public hearing with FAA and Massport Noise Abatement and Aviation Planning Officials. It was at this meeting in 1998 and through several communications between myself, Senator Kerry's Office and the FAA, that I learned why Chelsea is considered just outside the 65 dNL noise contour. It's because Massport submitted a map to the FAA based on a prediction made by a computer model that has consistently underestimated the noise level in our community. The proof is in the GEIR, and I will submit copies of my communications with the FAA along with this statement. Fact is that actual, that is measured noise results in Chelsea have been year after year above 65 and the predicted number used by Massport to assess the noise impact on the community is below 65. How convenient.

44.1

Without an accurate noise assessment the true impact of health, environment and real estate value effects can not be clearly defined, making any mitigation offer unreasonable. Based on the fact that Massport is using the same process to measure noise impacts that they have in black and white and in public admitted is not accurate, and based on the fact that the FAA recognizes the predicted noise levels are less than actual noise levels, the draft EIR should be rejected.

Further, it should be noted that the noise monitor location (figure 5.2-1) on page 5-13 indicates there is a permanent noise monitor on Admiral's Hill

44.2

in Chelsea, while all subsequent analysis of measured noise data is placed at "Shurtleff & Essex, Chelsea" a site that has not had a monitor since 1991, and then for only one year.

Another area of the EIR that is inadequate with respect to accuracy and thoroughness is the 4 page evaluation in section 8.7 of the environmental justice issue. Chelsea will receive the brunt of the short term negative impacts of this proposal should you see fit to give your approval. In a presentation to the Chelsea City Council on March 3, 1999 Massport representatives said runway 33 departures will increase from 4.8% to 12% of total departures (a 150% increase) and runway 15 arrivals will increase from 1.5% to 7.7% (a 413% increase). The associated increase in noise is large enough that, even using the understated predicted noise measures, 1100 homes will be eligible for soundproofing. While we feel sound insulation can not fully mitigate the impacts of increased ambient noise levels and many of the older homes will not be eligible for funding due to FAA Order 5100.38A which requires the property owner to bring homes up to code, we realize that Chelsea is the only community impacted devastatingly enough to qualify. The EIR concludes, "Given the reduction in the highest noise exposed population and this mitigation (soundproofing), the low income and minority population will not experience disproportionately high adverse impacts" in comparison to the affected population as a whole. This analysis is neither thorough, nor accurate, as the EPA Census maps on population density, minority concentration and people below poverty level ^{in Chelsea} show. The EIR's conclusion conflicts with President Clinton's Environmental Justice Executive Order 12898, which was designed to prevent the types of environmental and health injustices that have occurred in Chelsea for over a hundred years. To demonstrate this I have also attached a copy of an EPA funded report on the extent of industrial pollution in Chelsea and its relation to the socioeconomic status of Chelsea Residents. Essentially, the 4 page environmental justice analysis contained within the EIR does not adequately analyze the environmental effects, including human health, economic and social effects, of the proposed expansion. I would suggest the analysis is a yet another clever obfuscation of the truth, and that the analysis in the EIR doesn't meet the standards of the DOT Order.

44.3

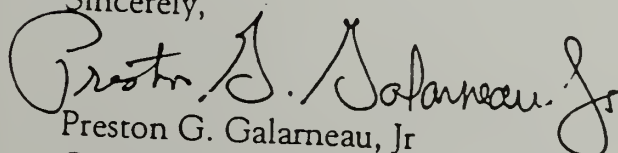
44.4

I really consider the two previous points my strengths, but I would like to briefly add that the EIR is either inaccurate or incomplete with respect to the following:

- * Alternatives under discussion such as a comprehensive peak hour pricing analysis using a range of operations per hour levels instead of the single higher operational threshold that underestimated the delay reduction. 44.5
- Hanscom should not be ruled out as a piece of the regionalization solution, and a second major airport should have at least been considered. 44.6
- * Air quality measurement. Noise and air quality equipment should be along flight paths, Chelsea's air monitor is at the Soldier's Home – out of harm's way. 44.7
- * The impact on the Upland Sandpiper. The plan to relocate and or mitigate for this endangered species is inadequate and indefinite. 44.8
- * Traffic Study. A study of the long-term traffic impacts on the surrounding communities should be as comprehensive as possible. 44.9
- * A benefit cost analysis – how can you realistically and honestly mitigate the noise, health and real estate costs to residents? 44.10
- * The commitment to maintain the new runway's unidirectional status – there isn't one. 44.11
- * Data used for this analysis is over 5 years old and doesn't reflect current conditions. 44.12

For all of these reasons, and I'm sure many more, I encourage you to find the proposal before us today functionally inadequate and I would respectfully request that a new draft document should be required before any expansion can be considered. I would also suggest that any future requests for expansion include an independent impact assessment that would meaningfully, thoroughly and accurately detail the impacts on surrounding communities like Chelsea.

Sincerely,



Preston G. Galarneau, Jr
Councillor District 8
Chelsea, MA



Chelsea City Council

City Hall
500 Broadway
Chelsea, MA 02150
(617) 889-8210
(617) 889-8349 Fax

Wednesday, July 01, 1998

The Honorable John F. Kerry
United States Senator
One Bowdoin Square
Tenth Floor
Boston, MA 02114

Dear Senator Kerry:

As a newly elected Councilman representing District 8 Chelsea residents, the single most common complaint I receive is about aircraft noise. Just a month or so after purchasing my home in the Historic Waterfront District I wrote to you to see if there was any possibility of relief. I was impressed with the timeliness of Constituent Services' response, and frankly I was satisfied with the explanation offered by Massport and the FAA: "Residential areas in Chelsea are outside of the 65 DNL contour and thus not eligible for federal funding." I have not written since.

Recently, however, in my capacity as Councilman I have taken the time to learn everything I could about this issue. The facts are disturbing. The truth of the matter is that Massport's "state-of-the-art Noise Monitoring System" on Admiral's Hill in Chelsea has measured Day Night Average Sound Levels (DNL's) above 65 in every year back through 1994! At last night's Subcommittee Meeting regarding air pollution resulting from Logan Airport I asked "Why, if the measured levels are above the 65 DNL level year after year, does Chelsea not qualify for assistance?" The answer is preposterous. Following FAA, Department of Transportation guidelines, Massport has provided the FAA with a noise exposure map based on "forecast aircraft operations at the airport for the fifth calendar year beginning after the date of submission." In other words, using data provided by Logan Airport, a computer model known as the INM (Integrated Noise Model) has predicted that Chelsea will fall below the 65 DNL level in 1999. Because of this our health is being ignored?

The system used to make this optimistic prediction (which has consistently been proven false by real world experience) is regarded by the FAA as "The Descriptor of Choice for Airport Noise Assessment." It is not hard to figure out why. The descriptor of choice has saved the FAA and Massport untold millions of dollars by being wrong again and again. That Massport has more than once chosen not to revise the model to more accurately reflect reality is indefensible. When you, or any other representative of the residents of District 8 explain why Chelsea is not eligible for Federal funding, I think it is important to explain the truth as Massport finally has. Then the question becomes do you accept it?

At the meeting last night I asked members of the Massport Noise Abatement team what will happen when 1999 is over and the hard data again proves the model wrong? The answer is a new model will be developed some time after the year 2000. I'm sorry, but I have little confidence in their ability to produce a model that will accurately reflect the noise of jet plane after plane roaring over the head of my 18 month old son as he plays in Palonia Park on a Sunday morning.

I respectfully request that you fully investigate this matter on behalf of your constituents in Chelsea.

Sincerely,

Preston G. Galameau, Jr.
District 8 City Councilor

ation of aircraft, in the air or on the ground.

"Sound exposure level" means the level, in decibels, of the time integral of squared A-weighted sound pressure during a specified period or event, with reference to the square of the standard reference sound pressure of 20 micropascals and a duration of one second.

"Yearly day-night average sound level" (YDNL) means the 365-day average, in decibels, day-night average sound level. The symbol for YDNL is also L_{dn} .

10 Dec. No. 18091, 49 FR 49269, Dec. 12, 1984, as amended by Amdt. 150-1, 53 FR 6724, Mar. 16, 1988; 53 FR 9724, Mar. 24, 1988; Amdt. 150-2, 54 FR 39296, Sept. 26, 1989.

§ 150.3 Designation of noise systems.

For purposes of this part, the following designations apply:

(a) The noise at an airport and surrounding area covered by a noise exposure map must be measured in A-weighted sound pressure level (L_{dn}) in units of decibels (dBA) in accordance with the specifications and methods prescribed under Appendix A of this part.

(b) The exposure of individuals to noise resulting from the operation of an airport must be established in terms of yearly day-night average sound level (YDNL) calculated in accordance with the specifications and methods prescribed under Appendix A of this part.

(c) Uses of computer models to create noise contours must be in accordance with the criteria prescribed under Appendix A of this part.

§ 150.11 Identification of land uses.

For the purposes of this part, uses of land which are normally compatible or noncompatible with various noise exposure levels to individuals around airports must be identified in accordance with the criteria prescribed under Appendix A of this part. Determination of land use must be based on professional planning criteria and procedures utilizing comprehensive, or master, land use planning, zoning, and building and site designing, as appropriate. If more than one current or future land use is permissible, determine

nation of compatibility must be based on that use most adversely affected by noise.

§ 150.13 Incorporations by reference.

(a) *General.* This part prescribes certain standards and procedures which are not set forth in full text in the rule. Those standards and procedures are hereby incorporated by reference and were approved for incorporation by reference by the Director of the Federal Register under 5 U.S.C. 552(a) and 1 CFR Part 51.

(b) *Changes to incorporated matter.* Incorporated matter which is subject to subsequent change is incorporated by reference according to the specific reference and to the identification statement. Adoption of any subsequent change in incorporated matter that affects compliance with standards and procedures of this part will be made under 14 CFR Part 11 and 1 CFR Part 61.

(c) *Identification statement.* The complete title or description which identifies each published matter incorporated by reference in this part is as follows:

International Electrotechnical Commission (IEC): Publication No. 179, entitled "Precision Sound Level Meters," dated 1973.

(d) *Availability for purchase.* Published material incorporated by reference in this part may be purchased at the price established by the publisher or distributor at the following mailing addresses:

IEC publications:

(1) The Bureau Central de la Commission Electrotechnique, Internationale, 1, rue de Varembe, Geneva, Switzerland.

(2) American National Standards Institute, 1430 Broadway, New York, NY 10018.

(e) *Availability for inspection.* A copy of each publication incorporated by reference in this part is available for public inspection at the following locations:

(1) FAA Office of the Chief Counsel, Rules Docket, AGC-10, Federal Aviation Administration Headquarters Building, 800 Independence Avenue, SW., Washington, D.C. 20591.

(2) Department of Transportation, Branch Library, Room 930, Federal Aviation Administration Headquarters

Federal Aviation Administration, DOT

Building, 800 Independence Avenue, SW., Washington, D.C. 20591.

(3) The respective Regional Offices of the Federal Aviation Administration as follows:

(i) New England Regional Office, 12 New England Executive Park, Burlington, Massachusetts 01803.

(ii) Eastern Regional Office, Federal Building, John F. Kennedy (JFK) International Airport, Jamaica, New York 11430.

(iii) Southern Regional Office, 3400 Norman Berry Drive, East Point, Georgia (P.O. Box 20636, Atlanta, Georgia) 30320.

(iv) Great Lakes Regional Office, 2300 East Devon, Des Plaines, Illinois 60018.

(v) Central Regional Office, 801 East 12th Street, Kansas City, Missouri 64108.

(vi) Southwest Regional Office, 4400 Blue Mound Road (P.O. Box 1689), Fort Worth, Texas 76101.

(vii) Northwest Mountain Regional Office, 17000 Pacific Highway, South, C-00000, Seattle, Washington 98108.

(viii) Western Pacific Regional Office, 16000 Aviation Boulevard Hawthorne, California (P.O. Box 92007, Worldway Postal Center, Los Angeles) 90009.

(ix) Alaskan Regional Office, 701 "C" Street, Box 14, Anchorage, Alaska 99513.

(x) European Office, 16, Rue de la Loi (3rd Floor) B1040 Brussels, Belgium.

(4) The Office of the Federal Register, Room 8401, 1100 "L" Street, NW., Washington, D.C.

IDoc. No. 18091, 49 FR 49269, Dec. 12, 1984, as amended by Amdt. 150-2, 54 FR 39296, Sept. 26, 1989.

Subpart B—Development of Noise Exposure Maps and Noise Compatibility Programs

§ 150.21 Noise exposure maps and related descriptions.

(a) Each airport operator may after completion of the consultations and public procedure specified under paragraph (b) of this section submit to the Regional Airports Division Manager five copies of the noise exposure map (or revised map) which identifies each

noncompatible land use in each depicted on the map, as of the date of submission, and five copies of a map setting forth—

(1) The noise exposure base forecast aircraft operations at the airport for the fifth calendar year following after the date of submission (based on reasonable assumptions concerning future type and frequency aircraft operations, number of time operations, flight patterns, port layout including any planned changes, and demographic changes in the surrounding area); and

(2) The nature and extent, if any, which those forecast operations affect the compatibility and land depicted on the map.

(b) Each map, and related documentation submitted under this section must be developed and prepared in accordance with Appendix A of this part or an FAA approved equivalent, in consultation with state, and planning agencies and planning agencies within the area, or any portion of whose jurisdiction is within the L_{dn} 65 contour depicted on the map, FAA global officials, and other Federal claims having local responsibility for land uses depicted on the map.

(c) Consultation must include registration of all interested persons at the airport operator shall certify that adequate opportunity to submit views, data, and comments concerning the correctness and adequacy of draft noise exposure map and descriptions of forecast aircraft operations of forecast aircraft operations has been afforded interested persons.

(d) The consultation accomplished under this paragraph and the opportunities afforded the public to review and comment during the development of the map. One copy of all written comments received during consultation shall also be filed with the Regional Airports Division Manager.

(e) The Regional Airports Division Manager acknowledges receipt of the exposure maps and descriptions and indicates whether they are in compliance with the applicable requirements.

The Regional Airports Division Manager

150—AIRPORT NOISE COMPATIBILITY PLANNING

Subpart A—General Provisions

- Sec.
150.1 Scope and purpose.
150.3 Applicability.
150.5 Limitations of this part.
150.7 Definitions.
150.9 Designation of noise systems.
150.11 Identification of land uses.
150.13 Incorporations by reference.

Subpart B—Development of Noise Exposure Maps and Noise Compatibility Programs

- 150.21 Noise exposure maps and related descriptions.
150.23 Noise compatibility programs.

Subpart C—Evaluations and Determinations of Effects of Noise Compatibility Programs

- 150.31 Preliminary review; acknowledgment.
150.33 Evaluation of programs.
150.35 Determinations; publications; effectiveness.

APPENDIX A TO PART 150—NOISE EXPOSURE MAPS

APPENDIX B TO PART 150—NOISE COMPATIBILITY PROGRAMS

AUTHORITY: 49 U.S.C. 1348, 1364 (int. 1421, 1431, 1101, 1102, 2103(a), 2104 (a) and (b), 2201, *et seq.*; 49 U.S.C. 1004 (revised, Pub. L. 97-449, Jan. 12, 1983).

SOURCE: Docket No. 18091, 49 FR 49209, Dec. 18, 1984, unless otherwise noted.

Subpart A—General Provisions

§ 150.1 Scope and purpose.

This part prescribes the procedures, standards, and methodology governing the development, submission, and review of airport noise exposure maps and airport noise compatibility programs, including the process for evaluating and approving or disapproving those programs. It prescribes single systems for— (a) measuring noise at airports and surrounding areas that generally provide a highly reliable relationship between protected noise exposure and surveyed reaction of people to noise; and (b) determining exposure of individuals to noise that

results from the operations of an airport. This part also identifies those land uses which are normally compatible with various levels of exposure to noise by individuals. It provides technical assistance to airport operators, in conjunction with other local, State, and Federal authorities, to prepare and execute appropriate noise compatibility planning and implementation programs.

§ 150.3 Applicability.

This part applies to the airport noise compatibility planning activities of the operators of "public use airports," including heliports, as that term is used in section 101(11) of the ASNA Act as amended (49 U.S.C. 2101) and as defined in section 803(17) of the Airport and Airway Improvement Act of 1982 (49 U.S.C. 2202).

(Docket No. 18091, 49 FR 49209, Dec. 18, 1984, as amended by Amdt. 150-1, 43 FR 6723, Mar. 16, 1988)

§ 150.5 Limitations of this part.

(a) Pursuant to the ASNA Act (49 U.S.C. 2101 *et seq.*), this part provides for airport noise compatibility planning and land use programs necessary to the purposes of those provisions. No submittal of a map, or approval or disapproval, in whole or part, of any map or program submitted under this part is a determination concerning the acceptability or unacceptability of that map and use under Federal, State, or local law.

(b) Approval of a noise compatibility program under this part is neither a commitment by the FAA to financially assist in the implementation of the program, nor a determination that all measures covered by the program are eligible for grant-in-aid funding from the FAA.

(c) Approval of a noise compatibility program under this part does not by itself constitute an FAA implementing action. A request for Federal action or approval to implement specific noise compatibility measures may be required, and an FAA decision on the request may require an environmental

tal Policy Act (42 U.S.C. 4321 *et seq.*) and applicable regulations, directives, and guidelines.

(d) Acceptance of a noise exposure map does not constitute an FAA determination that any specific parcel of land lies within a particular noise contour. Incompatibility for interpretation of the effects of noise contours upon adjacent land uses, including the relationship between noise contours and specific properties, rests with the sponsor or with other state or local government.

§ 150.7 Definitions.

As used in this part, unless the context requires otherwise, the following terms have the following meanings.

"Airport" means any public use airport, including heliports, as defined by the ASNA Act, including: (a) Any airport which is used or to be used for public purposes, under the control of a public agency, the landing area of which is publicly owned; (b) any privately owned reliever airport; and (c) any privately owned airport which is determined by the Secretary to enplane annually 2,500 or more passengers and receive scheduled passenger service of aircraft, which is used or to be used for public purposes.

"Airport noise compatibility program" and "program" mean that program, and all revisions thereto, reflected in documents (and revised documents) developed in accordance with Appendix B of this part, including the measures proposed or taken by the airport operator to reduce existing non-compatible land uses and to prevent the introduction of additional non-compatible land uses within the area.

"Airport Operator" means the operator of an airport as defined in the ASNA Act.

"ASNA Act" means the Aviation Safety and Noise Abatement Act of 1979, as amended (49 U.S.C. 2101 *et seq.*).

"Average sound level" means the level, in decibels, of the mean-square, A-weighted sound pressure during a specified period, with reference to the square of the standard reference sound pressure of 20 micropascals.

this part as noise; the outdoor noise adequately attenuated noise level reduction for any indoor activities involved) at the location because the yearly day-night average sound level is at or below that identified for that or similar use under Appendix A (Table 1) of this part.

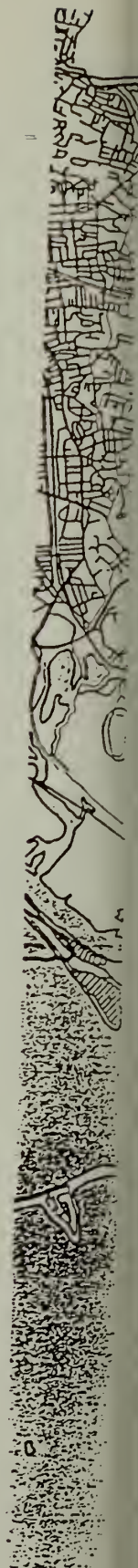
"Day-night average sound level" (DNL) means the 24-hour average sound level, in decibels, for the period from midnight to midnight, obtained after the addition of ten decibels to sound levels for the periods between midnight and 7 a.m., and between 10 p.m. and midnight, local time." The symbol for DNL is L_{dn} .

"Noise exposure map" means a scaled, geographic depiction of an airport, its noise contours, and surrounding area developed in accordance with section A150.101 of Appendix A of this part, including the accompanying documentation setting forth the required descriptions of forecast aircraft operations at that airport during the fifth calendar year beginning after submittal of the map, together with the ways, if any, those operations will affect the map (including noise contours and the forecast land use).

"Noise level reduction" (NLR) means the amount of noise level reduction in decibels achieved through incorporation of noise attenuation (between outdoor and indoor levels) in the design and construction of a structure. "Noncompatible land use" means the use of land that is identified under this part as normally not compatible with the outdoor noise environment (or an adequately attenuated noise reduction level for the indoor activities involved at the location) because the yearly day-night average sound level is above that identified for that or similar use under Appendix A (Table 1) of this part.

"Regional Airports Division Manager" means the Airports Division Manager having responsibility for the geographic area in which the airport in question is located.

"Restriction affecting flight procedures" means any requirement, limitation, or other action affecting the op-



Measured Ldn Noise Levels Report

Summary of Measured
Day-Night Equivalent Sound Levels
Summary to Date

Area	Location	Site No	1991	1992	1993	1994	1995	1996	1997	Jan-Feb 1998
South End	E Dedham	1	86.0	64.6	66.2	66.3	65.9	66.4	65.8	66.0
S Boston	Bolton St	2	89.9	68.1	87.5	68.1	68.2	69.0	69.4	69.2
S Boston	SB Yacht Club	3	87.8	69.4	89.3	68.2	68.1	66.8	67.1	68.5
Winthrop	Grandview	4	80.0	79.7	79.8	79.1	79.6	78.8	80.4	81.3
Winthrop	Faun Bar	5	72.5	72.7	73.3	72.0	71.7	71.7	71.1	72.1
Winthrop	Somerset	6	71.7	71.1	71.1	71.5	71.0	71.1	71.4	70.6
Winthrop	Loring Rd	7	74.1	74.1	74.1	74.1	73.4	73.8	74.4	73.3
Winthrop	Morton St	8	68.7	67.6	68.4	68.6	67.2	67.8	68.2	69.5
E Boston	Annaroy	9	75.1	75.8	75.6	76.0	75.8	75.7	76.0	75.3
E Boston	Shawsheen	10	71.4	71.2	71.3	70.6	70.2	70.8	71.9	71.7
E Boston	OH Hill	11	Not In	Not In	Not In	Not In	Not In	66.4	66.8	66.6
E Boston	EB Yacht Club	12	73.9	73.2	Down	71.7	71.6	72.7	72.7	71.4
E Boston	EB High	13	88.4	66.5	64.9	65.4	66.4	66.5	67.1	68.4
E Boston	JP Yacht Club	14	69.1	87.5	67.4	65.7	66.6	66.9	67.0	68.2
Chelsea	Admiral's Hill	15	69.1	Down	Down	67.0	67.2	68.5	67.6	67.9
Revere	Bradstreet	16	71.8	71.3	71.4	69.9	71.8	72.3	71.9	70.1
Revere	Carey Circle	17	66.4	67.2	66.4	68.8	66.7	66.7	66.7	66.4
Nahant	CG Rec Facility	18	68.8	68.3	68.1	68.2	66.7	66.7	65.8	66.7
Swampscott	Smith Lane	19	58.7	57.6	58.8	56.8	56.8	56.7	56.9	56.3
Lynn	Flax Pond	20	65.5	59.3	60.6	59.4	58.8	59.8	58.2	57.8
Everett	Prescott	21	60.6	62.4	62.9	60.2	60.6	60.7	61.0	60.7
Medford	Magoun	22	61.7	61.3	59.6	59.6	60.2	60.0	60.7	59.9
Dorchester	Myrtlebank	23	63.8	63.4	63.8	63.2	62.8	62.5	62.7	63.5
Milton	Cunningham Pk	24	60.6	60.9	61.8	60.7	60.6	60.6	60.6	61.4
Quincy	Squaw Rock Pk	25	58.5	58.6	59.5	56.6	57.2	57.9	60.1	57.5
Hull	Hull HS	26	72.0	65.0	65.7	64.1	63.7	63.6	63.7	64.2
Roxbury	Bos Latin Academy	27	Not In	Not In	Not In	Not In	Not In	Not In	64.7	65.3
Mattapan	Lewenberg School	29	Not In	Not In	Not In	Not In	Not In	Not In	59.4	59.3
East Boston	Piers Park	30	Not In	Not In	Not In	Not In	Not In	63.6	63.4	63.4



Table 6-5 presents a comparison of the measured L_{dn} values at each installed monitoring location to the corresponding value calculated by the adjusted INM 5.0 for 1996. As expected, the best agreement is seen at the sites close to the airport, where aircraft noise is greatest. At the more remote locations, the measured noise level tends to be significantly higher than the INM-predicted value, since community sounds from traffic on local roads and other human activity contribute more to the overall noise level. Also, aircraft flight paths far from the airport are usually more dispersed over the ground, and hence are more difficult to model. For example, at sites 4 and 5 in Winthrop, where the dominant source of noise is aircraft overflights from arrivals on Runway 27 and departures on Runway 9, the INM-predicted noise level is within one decibel of the measured noise levels. Any community noises at these sites contribute far less to the overall sound levels than the aircraft noise.

Table 6-5
Comparison of Measured L_{dn} Values to INM-Computed L_{dn} Values for 1996

Site	Location	1996 Measured	1996 INM ^a
1	Andrews Street, South End	66.4	60.7
2	B and Bolton, South Boston	69.0	66.4
3	Day Blvd. near Farragut, South Boston	66.8	64.2
4	Bayview and Grandview, Winthrop	78.8	79.0
5	Harborview and Faun, Winthrop	71.7	71.4
6	Somerset and Johnson, Winthrop	71.1	67.7
7	Loring Road near Court, Winthrop	73.8	76.4
8	Morton and Amelia, Winthrop	67.8	67.2
9	Bayswater and Annavoy, East Boston	75.7	72.5
10	Bayswater/Shawsheen, East Boston	70.8	66.3
11	Orient Heights, East Boston	66.4*	62.1
12	East Boston Yacht Club	72.7	73.8
13	East Boston High School	66.5	64.3
14	Jeffries Point Yacht Club, East Boston	66.9	64.4
15	Admiral's Hill, Chelsea	68.5	61.4
16	Bradstreet and Sales, Revere	72.3	69.8
17	Carey Circle, Revere	66.7	59.5
18	U.S.C.G. Recreational Facility, Nahant	66.7*	49.3
19	Smith Lane, Swampscott	56.7	46.5
20	Pond and Towns Court, Lynn	59.9	51.0
21	Tremont near Prescott, Everett	60.7	53.2
22	Magoun near Thatcher, Medford	60.0	49.2
23	Myrtlebank/Hilltop, Dorchester	62.5	53.7
24	Cunningham Park, Milton	60.6	51.5
25	Squaw Rock Park, Quincy	57.9	49.9
26	Hull High School, Hull	63.6	56.2
30	Piers Park, East Boston	63.6*	61.7

* Indicates partial data; monitor not operational for full year
INM Version 5.0 with adjusted database

NA Data not available

Note: Sites 27, 28, and 29 to be installed in late summer 1997 as a result of the Runway 27 EIS process.

6-24 Noise Abatement

United States Senate

WASHINGTON, DC 20510-2102

BANKING, HOUSING, AND
URBAN AFFAIRS
COMMERCE, SCIENCE,
AND TRANSPORTATION
FOREIGN RELATIONS
INTELLIGENCE
SMALL BUSINESS

One Bowdoin Square
Tenth Floor
Boston, MA 02114
(617) 565-8519

July 21, 1993

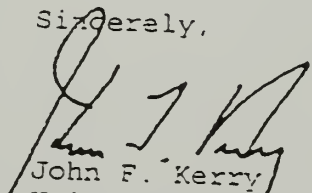
Mr. Preston G. Galarneau, Jr.
District 8 City Councilor
Chelsea City Council
City Hall
500 Broadway
Chelsea, Massachusetts 02150

Dear Mr. Galarneau:

Regarding your correspondence, enclosed you will find a response to an inquiry my office made to the FAA.

I thank you for your patience and will forward you future correspondence on this issue. If you have any questions regarding this matter, please call Mark S. Sternman of my Boston office at (617) 565-8519.

Sincerely,


John F. Kerry
United States Senator

JFK/mss

*He'll like
visit the town -*

*Spoke w/ Sternman -
will address homelessness issue
- and -
encourage feel to Encourage Massport
Blow it the Noise Control Mfg.*



U.S. Department
of Transportation
Federal Aviation
Administration

New England Region

12 New England Executive Park
Burlington, MA 01803-5299

JUL 16 1998

The Honorable John F. Kerry
United States Senator
One Bowdoin Square
Tenth Floor
Boston, Massachusetts 02114

Dear Senator Kerry:

We are responding to your letter of July 2, 1998, concerning aircraft noise issues contained in a July 1, 1998, letter to you from Chelsea City Councilor Preston G. Galarneau.

Mr. Galarneau questions the accuracy of the Integrated Noise Model (INM) in predicting the noise environment from Logan International Airport in Chelsea, citing measured noise levels that exceed INM-predicted noise levels. He also criticizes use of forecasted 1999 noise contours in establishing eligibility for Massachusetts Port Authority's (Massport) soundproofing program.

We would expect community noise measurements to exceed INM-predicted noise levels since measured noise reflects ambient noise levels. As is stated in the text from the page of the study that Mr. Galarneau provided, "At the more remote locations, the measured noise level tends to be significantly higher than the INM-predicted value, since community sounds from traffic on local roads and other human activity contribute more [than at close-in locations] to the overall noise level." This factor and the capability of the model to predict noise levels at lower levels such as 65 DNL explain at least some of this difference.

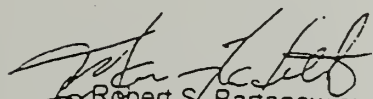
Remote?
Remoteness
of Chelsea!

Since 1994, the Federal Aviation Administration has required that Massport utilize a forecasted 1999 noise contour as the basis of soundproofing eligibility. This noise contour reflects the noise environment from close to 100% compliance with the requirement to phase out older, noisier airline aircraft. We require its use because we are concerned that scarce resources for soundproofing not go toward soundproofing residences that would no longer need it until sometime after the year 2000 when growth in aircraft operations would cause noise contours to expand again.

Massport may submit a new official noise exposure map for post-1999 at any time. Alternatively, they will need a new one after 1999. We note that progress on residential soundproofing of currently eligible homes indicates that Massport's program will be ongoing for several more years. As the soundproofing program continues, it needs to be recognized that the list of eligible homes will probably exceed the available Airport Improvement Program (AIP) funds that can be provided on an annual basis.

Should Chelsea become eligible as part of any new noise exposure map, they too must be part of the on-going list of eligible homeowners. On a positive note, it is the largest soundproofing program in the New England Region and we have been successful in providing AIP funds on an annual basis. Hopefully that will continue with reauthorization of the AIP.

Sincerely,



Robert S. Bartanowicz
Regional Administrator

United States Senate

WASHINGTON, DC 20510-2102

BANKING, HOUSING, AND
URBAN AFFAIRS
COMMERCE, SCIENCE,
AND TRANSPORTATION
FOREIGN RELATIONS
INTELLIGENCE
SMALL BUSINESS

One Bowdoin Square
Tenth Floor
Boston, MA 02114
(617) 565-8519

September 3, 1998

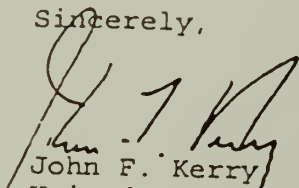
Mr. Preston G. Galarneau, Jr.
District 8 City Councilor
Chelsea City Council
City Hall
500 Broadway
Chelsea, Massachusetts 02150

Dear Mr. Galarneau:

Regarding your correspondence, enclosed you will find a response to an inquiry my office made to the FAA.

I thank you for your patience and will forward you future correspondence on this issue. If you have any questions regarding this matter, please call Mark S. Sternman of my Boston office at (617) 565-8519.

Sincerely,


John F. Kerry
United States Senator

JFK/mss



U.S. Department
of Transportation
Federal Aviation
Administration

New England Region

12 New England Executive Park
Burlington, MA 01803-5299

Congressional Courtesy Copy

AUG 28 1998

The Honorable John F. Kerry
United States Senator
One Bowdoin Square
Tenth Floor
Boston, Massachusetts 02114

Dear Senator Kerry:

We are responding to your letter of August 10, 1998, which was written as a follow-up to our letter of July 16, 1998, to Chelsea City Councilor Preston G. Galarneau. Your letter addresses two points stated in our letter.

Can you believe this? [The first point refers to the use of the term "remote locations" in describing a noise monitoring location in Chelsea, noting that Chelsea is not a remote location. Please understand that this term was quoted from an environmental study not written by the Federal Aviation Administration. Thus, we cannot state with certainty what the author intended. From the context in which it is used, however, our interpretation is that it appears to be used as a relative term to connote that the Admirals Hill noise monitoring site is remote when compared to the other noise monitoring sites detailed in the report. We don't think that it was meant to connote that Chelsea is remote from Logan International Airport.]

The second point refers to encouraging Massachusetts Port Authority (Massport) to update its noise exposure map sooner rather than later in order to account for actual rather than predicted conditions. While we will suggest this to Massport, it may have little effect on soundproofing in Chelsea, assuming that areas of Chelsea are found eligible. The reason for this is that Massport is currently soundproofing homes in East Boston that are exposed to greater noise levels and, given the level of funding that we have been able to apply, anticipates doing so for several more years.

We have been strong advocates for soundproofing funds for the three airports in New England that are part of our program (Boston, Providence, and Manchester). Over the years Massport has received substantially more for Logan than the other two airports combined. We will continue to push hard for these funds.

Sincerely,

Robert S. Bartanowicz
Robert S. Bartanowicz

Robert S. Bartanowicz
Regional Administrator

- (1) When configuration 33/27 is in use, hourly Leqs in Chelsea can reach the low 70's during high volume periods of the day.
- (2) When Runway 33 is being used for departures, maximum event noise levels are often in the mid-90 dBA range, and can exceed 100 dBA.
- (3) Not un-expectedly, noise levels from Runway 33 departures are generally slightly higher at the Galameau residence than at the permanent monitor. This results from the lower altitudes of the aircraft overflying the Galameau residence, which is closed to the airport than the permanent monitor.

Please advise if you want me to distribute any of the above, and to whom.

cc: T. Kinton (w/o enclosures)
K. Dillon (w/o enclosures)
T. Butler (w/o enclosures)
D. Steele (w/o enclosures)
N. Timmerman (w/o enclosures)

✓ REALITY VS MASS PORT !
This is what happens when you listen
to the noise instead of predicting it
with a computer model.

MEMORANDUM

TO: Betty Desrosiers
FROM: Emilio Favorito
DATE: 23 November 1998
RE: GALARNEAU SURVEY DATA/ RESULTS

Attached please find the data and analysis results from the noise monitoring survey which was conducted at City Councillor Preston Galarneau's residence at 15 Beacon Street in Chelsea, as requested. The survey spans the 16-day time period from October 26th to November 10th.

The following items are attached:

- A- "INTERVAL REPORT - Galarneau" (16 pages) provides the hourly Leq, Lmin, Lmax, L5, L50 and L90 for each of the hours that the portable monitor was recording data over the 16-day period.
- B- "HOURLY NOISE STATISTICS - RMS 15" (10 pages) provides equivalent data from the permanent Chelsea noise monitor.
- C- "RUNWAY CONFIGURATION" Report (3 pages) provides the runway configurations in use for the time period in question.
- D- "SUMMARY/COMPARISON (5 days)" (5 pages) essentially takes the "INTERVAL REPORT - Galarneau" and adds in the Leq and Lmax data from the permanent monitor (columns marked RMS 15), as well as the listed runway configuration (column marked "config").

The following items were also compiled, but are *not* included in the attachments. They are available if desired.

- E- "EXCEEDANCE REPORT- Galarneau" (28 pages) lists noise data for each of the individual noise events at that location that exceeded the monitor threshold.
- F- "RMS 15 EVENTS" (38 pages) provides similar information for the permanent Chelsea noise monitor.

From item "D" the following observations can be made:

(1) When configuration 33/27 is in use, hourly Leqs in Chelsea can reach the low 70's during high volume periods of the day.

(2) When Runway 33 is being used for departures, maximum event noise levels are often in the mid-90 dBA range, and can exceed 100 dBA.

(3) Not un-expectedly, noise levels from Runway 33 departures are generally slightly higher at the Galameau residence than at the permanent monitor. This results from the lower altitudes of the aircraft overflying the Galameau residence, which is closed to the airport than the permanent monitor.

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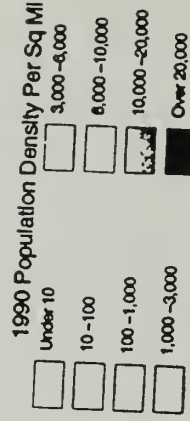
CHELSEA

Zip Code: 02150

This computer representation has been compiled by the U.S. Environmental Protection Agency (EPA) from sources which have supplied data or information that has not been verified by the EPA. This data is offered here as a general representation only, and is not to be used for commercial purposes without verification by an independent professional qualified to verify such data or information. The EPA does not guarantee the accuracy, completeness, or timeliness of the information shown and shall not be liable for any loss or injury resulting from reliance upon the information shown.

LEGEND

- Public Water Supply
EPA SDWS System
- Hospital
(From 1988 OHS names file)
- School
(From 1988 OHS names file)
- Basin Boundary
USGS Catalog Unit
- County Boundary
- Zip Code Boundary
Licensed by GDT Inc.

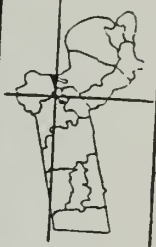


Albers Projection



U.S. Environmental Protection Agency

Produced March 18, 1999
By ZEPHUS (Rev. 4-87)










CHELSEA

Zip Code: 02150







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LEGEND

-  Public Water Supply
EPA SDWIS System
-  Hospital
(From 1988 QMS names file)
-  School
(From 1988 QMS names file)
-  Bath Boundary
(From 1988 QMS names file)
-  USGS Catalog Unit
-  County Boundary
-  Zip Code Boundary
Licensed by GDT Inc.

Percent People with Income Below Poverty Level

Data from Census 87 TFRSA based on 1980 income.
Data is summarized by 1990 Census Block Group areas.

-  0 to 12 Percent
-  12 to 25 Percent
-  25 to 50 Percent
-  50 to 75 Percent
-  Above 75 Percent
-  No Persons

0 0.4 Miles
Albers Projection



U.S. Environmental Protection Agency

Produced March 18, 1989
By DPM/CO (Rev. 08/87)

CHELSEA

Zip Code: 02150

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LEGEND

- Note: Facility labeling turned OFF if more than 250 points.
Some facilities with poor addresses may plot at zip code centroids.
Facility points have been restricted to user specified zip code area.
- | | | | |
|--|---|--|--|
| | CE RCLIS NPL Site | | Unidentified or Poor Local Accuracy (More than 50) |
| | CE RCLIS NPL Site (Proposed) | | Public Water Supply EPA SDWS System |
| | CE RCLIS Deleted From NPL Final Site | | Hospital (From 1988 GH&S names) |
| | CE RCLIS Part of NPL Final Site | | School (From 1988 GH&S names) |
| | CE RCLIS Non-NPL Site Made Inactive by Approval | | Death Boundary USGS Catalog Unit |
| | Archived from CE RCLIS | | County Boundary |
| | RCRA TSD or LQG Site (Others Excluded) | | Zip Code Boundary Labeled by GDT Inc. |
| | EPCRA TTRI Site (Toxic Release Inventory) | | |
| | PCS Facility Site | | |
| | AFB/AFS Site | | |

1990 Census - Percent People of Color

People of Color was calculated by subtracting the White not of Hispanic origin count from the Total Persons count. Data is summarized by 1990 Census Block Group areas.

- | | | | |
|--|------------------|--|------------------|
| | 0 to 12 Percent | | 50 to 75 Percent |
| | 12 to 25 Percent | | Above 75 Percent |
| | 25 to 50 Percent | | No Persons |

0 0.4 Miles
Albers Projection



U.S. Environmental Protection Agency

Produced March 18, 1999
By EPA/DO (Data Services)



INDUSTRIAL POLLUTION IN CHELSEA

AN ENVIRONMENTAL SURVEY BY
THE MASSACHUSETTS TOXICS CAMPAIGN FUND

November 1996

Funded by the U.S. Environmental Protection Agency

INDUSTRIAL POLLUTION

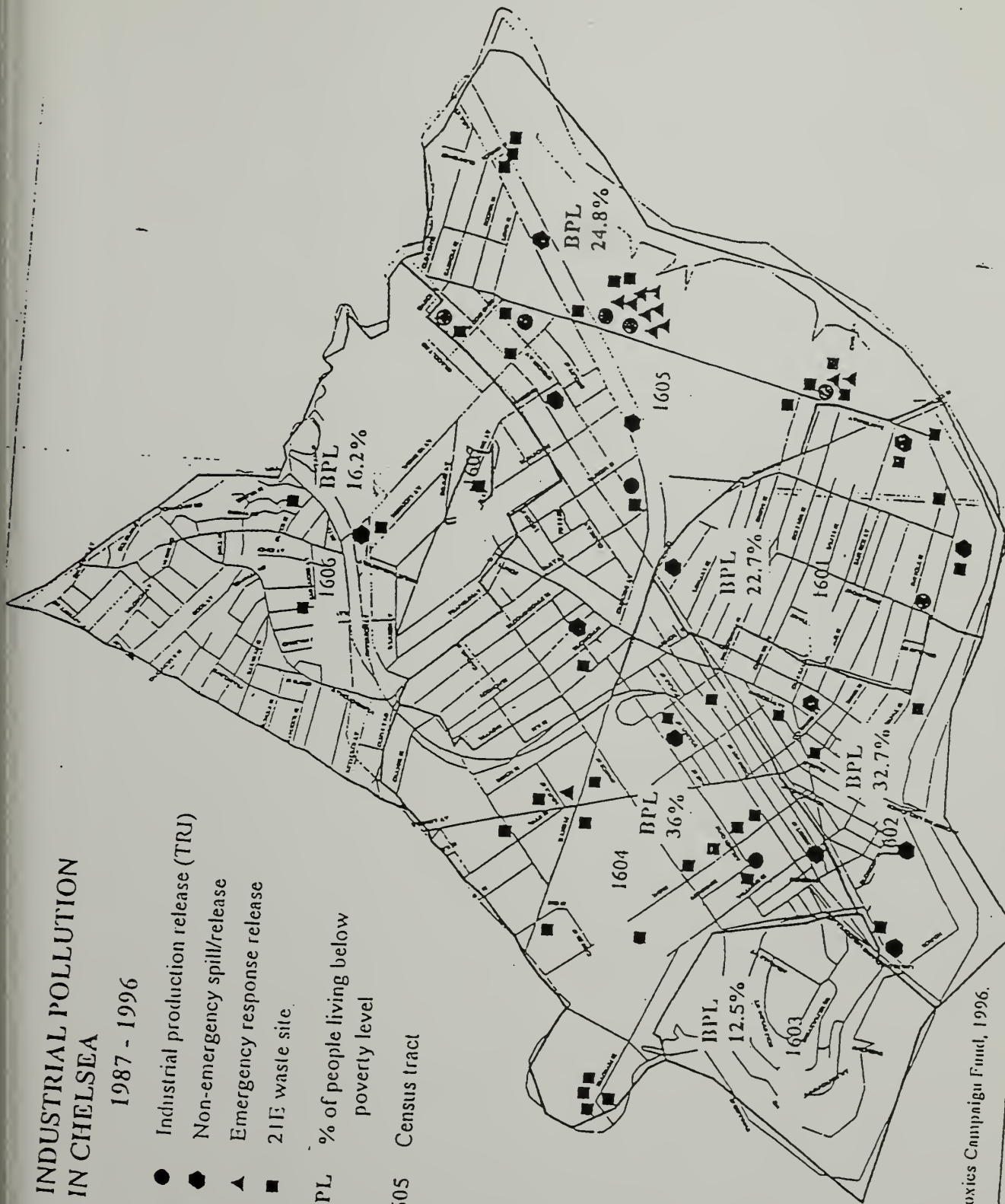
INDUSTRIAL POLLUTION IN CHELSEA

1987 - 1996

- Industrial production release (TRI)
- ◆ Non-emergency spill/release
- ▲ Emergency response release
- 21E waste site

BPL % of people living below
poverty level

1605 Census tract



Mass. Toxics Campaign Fund, 1996.

Base map by City of Chelsea, 1995.

INDUSTRIAL POLLUTION IN CHELSEA

Summary

- * From 1987 to 1994, as part of normal production, industrial companies in Chelsea reported that they released 666,188 pounds of toxic chemicals into the environment, or 83,274 pounds each year. Nearly all of this amount was released directly into the air. Over 95% of the air releases were made of three toxic chemicals: 1,1,1-trichloroethane, xylene, and toluene. These three chemicals can seriously damage human health. These companies are located mainly in the industrial area in the northeastern part of the city near Revere and the Chelsea River.
- * Seven companies reported emergency releases of toxic chemicals (mainly fuel) during the 1987-1995 period. Some of these releases were very large. One was greater than 200,000 pounds of fuel. These companies are located mainly along Eastern Avenue and the waterfront area.
- * Numerous other small, non-emergency releases of toxic chemicals took place, not only in industrial areas, but at several schools, too. High concentrations of lead and other toxins were turned up at the Williams and Shurtleff Schools.
- * Chelsea is home to 44 toxic waste sites, also called "21E" sites, scattered throughout the western industrial area (near Everett) and the eastern waterfront industrial sections. Some of these sites contain hazardous waste, while most contain petroleum waste. These areas are known as "brownfields". Most of these sites are still far from being cleaned up.
- * Chelsea's four biggest users of toxic chemicals used over 2.5 million pounds of reproductive toxins in 1993. These chemicals can damage the human reproductive system.
- * Higher levels of pollution appear to be present in neighborhoods with a higher percentage of low income residents - particularly in low-income communities of color - while fewer sources of industrial contamination are found in higher income neighborhoods.

Scope of the Study

This study examines the extent of industrial pollution in Chelsea and its possible relation to socioeconomic status of Chelsea residents.

Lead poisoning is considered to be the main environmental health hazard in Chelsea, due to high incidence of older housing stock containing lead paint. In this study we do not quantify the extent of lead contamination and its health effects. We do recognize, however, the strong link between lead poisoning and a general lack of education about lead hazards and the lack of financial means among low income residents to have lead dangers removed.

Instead, we examine the extent of industrial toxic releases and their relation to socioeconomic status of Chelsea residents. Industrial and commercial pollution in Chelsea occurs in several ways:

- 1) As a frequent release into the environment from a factory or other business establishment. Businesses large enough are asked (voluntarily) to report what they emit into the environment each year to the U.S. Environmental Protection Agency. This information is compiled annually in the federal Toxic Release Inventory.
- 2) As an accidental release or spill. These are single events, not continuous or frequent releases over the period of one year, as is reported in the Toxic Release Inventory. Sometimes these releases are reported as an emergency, particularly if they are big. Other times, when they

are small and are not thought to pose a threat to the public, they are reported as non-emergency spills or releases.

3) As a "21E" waste site. 21E is a designation given by the Massachusetts Department of Environmental Protection to sites where significant amount of petroleum waste or hazardous waste have accumulated.

In addition, toxic chemicals used in production, and stored on-site at factories, are considered to be a potential health hazard, even if they are not actually released into the community.

Reported Toxic Releases from Industrial Production

According to the federal Toxic Release Inventory (TRI) Chelsea has experienced significant industrial toxic releases since reporting began in 1987. Tables 1 and 2 show toxic releases from the Toxic Release Inventory for each year from 1987 to 1994. Total reported environmental releases have risen from 53,555 lbs. in 1987, to a peak level of 167,539 lbs. in 1989, then declining somewhat through 1992, before dropping off significantly in 1993 and 1994. Nearly all of the pounds released were released to the air.

The three major pollutants - 1,1,1-trichloroethane, xylene, and toluene - are chemicals which, at high enough levels, can seriously damage human health, including causing cancer. See Table 3 for a brief description of the health effects from exposure to these chemicals.

The sources of this pollution are six industrial facilities. The largest emissions came from Emtex, Inc., and Glyptal, Inc., both located in the northeastern part of the city, near Chelsea Creek. At its peak, the largest polluter, Emtex (181 Spencer Ave.), released 140,844 pounds of 1,1,1-trichloroethane into the air in 1989 and 113,656 pounds into the air in 1992. Since 1992, however, there are no reported toxic releases from Emtex.

Glyptal (305 Eastern Ave.) released a peak level of 20,164 pounds of 8 chemicals into the air in 1989. Since then its releases have gradually dropped down to around 10,000 pounds in 1992-1994. The company's major pollutants are xylene and toluene.

Accidental Releases or Spills: Emergency and Non-Emergency

Seven companies reported emergency response releases or spills during the period of 1987-1995 (see Table 4). Most of these companies are located in the industrial areas along the Chelsea River. Nearly all of the releases or spills were gasoline or oil. Several releases were very large. Gulf Oil (281 Eastern Ave.) released 68,961 pounds of gasoline in 1992 and 13,200 pounds of kerosene in 1990. Amoco Oil (111 Eastern Ave.) released 203,000 pounds of fuel oil in 1993. B.A.T. Transportation (281 Eastern Ave.) released 15,250 pounds of gasoline in 1993. Coastal Oil (at Chelsea Dock) released 50,040 pounds of asphalt in 1994.

There were numerous smaller, non-emergency releases of toxic chemicals in the past several years alone, as documented by the Mass. Department of Environmental Protection. Table 6 locates these smaller releases by census tract. Some of these smaller releases include heavy metals - such as zinc, copper, and lead - and relatively small amounts of fuel oil or petroleum hydrocarbons. Several releases are notable. The Shurtleff School (76 Congress Ave.) experienced a release of petroleum hydrocarbons (860 parts per million) and lead (490 parts per million) in June, 1995. There was a release of lead at a very high concentration (13,000 parts per million) at the Williams School (170-180 Walnut St.) in September 1994.

"21E" Waste Sites

Chelsea is home to 44 "21E" waste sites, as identified by the Department of Environmental Protection (see Table 5). Most of these waste sites contain petroleum waste, while seven sites contain non-petroleum hazardous waste alone, and 12 sites contain both petroleum and hazardous wastes. These sites are in various stages of clean-up (or "remediation"). But it appears that most of the sites are not close to being cleaned up. The waste sites are located at a wide variety of facilities, from the Williams School to Amoco Petroleum to Forbes Lithographic to the Chelsea Housing Authority. They are found largely in the city's western industrial area and the northeastern industrial area along the Chelsea River.

Many of these sites are considered "brownfields". This means that they are on vacant land, contain abandoned or vacant buildings, and have a slight or moderate degree of contamination. Brownfields are typically not seriously contaminated waste sites, such as a "Superfund" (as designated by the U.S. Environmental Protection Agency). Rather they are lands that could be put to other uses after an effective cleanup takes place. What should happen to these brownfields in Chelsea after they are cleaned up is an important issue.

Toxic Chemicals Used in Industrial Production

In addition to toxic releases and waste sites, many companies use toxic chemicals in their day-to-day production activities. Table 7 shows the four biggest industrial users of toxic chemicals in Chelsea. Each of these companies also uses toxic chemicals which have been proven to cause reproductive damage in humans. Biltrite Corp., Emtex, Glyptal, and Marson Corp., together used 2,511,424 pounds of reproductive toxins in their production activities in 1993, as documented by MASSPIRG and the Greater Boston Physicians for Social Responsibility (1996). Reporting of amount of toxic chemicals being used or stored or produced at a facility is not a strict legal requirement; reporting is only voluntary. This means that numerous other businesses in Chelsea, especially small businesses, are probably using or releasing toxic chemicals without reporting it.

Pollution and Socio-Economic Status

The most significant industrial pollution sources in Chelsea are found in the city's eastern sections, in close proximity to residential neighborhoods, and in the sparsely populated western industrial section. The northeastern section of the city (census tract 1605) has the highest percentage of communities of color living below the poverty line. According to the 1990 Census (see Table 9), 49% of African-Americans, 50% of Asians, and 50% of Hispanics lived below the poverty line in Census Tract 1605. This tract experienced the highest level of continuous toxic releases (from the Toxic Release Inventory) (see Table 8). Also located in this section of the city are three auto body shops and two dry cleaners, potential sources of highly toxic releases which typically go unreported. In addition, a greater incidence of petroleum fuel spills and leaks occurred in this section than elsewhere in the city.

The two census tracts with the highest percentage of Hispanic residents, tracts 1602 and 1604, also demonstrated a higher incidence of toxic releases than other parts of the city. Percentage of Hispanics living below the poverty line was 41% and 47% in these two tracts.

Recommendations

- 1) The Chelsea Fire Department should check the Toxics Use Reduction chemicals (used in industrial production) against their files in order to ensure emergency preparedness.
- 2) Exact status of 21E waste sites should be made known to Chelsea residents by the Department of Environmental Protection. It is not clear as to how close to completion of cleanup each of these sites is.
- 3) There needs to be far better public access to information on industrial toxic hazards. The Department of Environmental Protection's online database is not yet very user friendly. Getting access to environmental information at DEP is a very time-consuming process; the average citizen does not have this kind of time.
- 4) The companies releasing toxic chemicals into the environment need to be tracked further. For example, whatever happened to Emtex, Inc., which was once (up to 1992) the biggest releaser of toxic chemicals into the environment in Chelsea. Emtex is no longer reporting. Did the company move? Better tracking is critical. The City of Chelsea should help track these companies and provide that information to residents on a yearly basis.
- 5) There needs to be a closer examination of the proximity of current residential neighborhoods and schools to industrial environmental hazards.

For further information, contact:

Thomas Estabrook
Massachusetts Toxics Campaign Fund
(617) 666-1326

or write us at:

160 2nd Street
Cambridge, MA 02142

Information on waste sites and toxic releases can be obtained from:
Massachusetts Department of Environmental Protection, (617) 292-5500.
Ask for the waste site cleanup department, the air quality division, or the toxics
use reduction department.

Letter 44

City of Chelsea

Preston G. Galarneau Jr., City Councillor

Code	Topic 1	Topic 2	Comment	Response
44.1	Noise	Model	... measured noise results in Chelsea have been year after year above 65 and the predicted number used by Massport to assess the noise impact on the community is below 65... Without an accurate noise assessment the true impact of health, environment and real estate value effects can not be clearly defined....	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>). In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the <i>Logan Airport 1999 ESPR</i> (previously GEIR)). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.
44.2	Noise	Model	...it should be noted that the noise monitor location (Figure 5.2-1) on Page 5-13 indicates there is a permanent noise monitor on Admiral's Hill in Chelsea, while all subsequent analysis of measured noise data is placed at "Shurtleff & Essex, Chelsea" a site that has not had a monitor since 1991, and then for only one year.	All the tables in the Airside Project Draft EIS/EIR that indicated that Monitor No. 15 is at Shurtleff & Essex have been changed in the Supplemental DEIS/FEIR to indicate that Monitor No. 15 is at Admiral's Hill.

Code	Topic 1	Topic 2	Comment	Response
44.3	Environmental Justice	Impacts	Another area of the EIR that is inadequate with respect to accuracy and thoroughness is the 4-page evaluation in Section 8.7 of the environmental justice issue. Chelsea will receive the brunt of the short term negative impacts of this proposal should you see fit to give your approval...The associated increase in noise is large enough that, even using the understated predicted noise measures, 1100 homes will be eligible for soundproofing.	<p>The Environmental Justice analysis was significantly expanded in Section 6.8 of the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on Environmental Justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations from the Preferred Alternative.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation.</p>
44.4	Environmental Justice	Impacts	The EIR concludes, "Given the reduction in the highest noise exposed population and this mitigation (soundproofing), the low income and minority population will not experience disproportionately high adverse impacts" in comparison to the affected population as a whole. This analysis is neither thorough, nor accurate, as the EPA Census maps on population density, minority concentration and people below poverty level [in Chelsea] show. The EIR's conclusion conflicts with President Clinton's Environmental Justice Executive Order 12898...	<p>Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively.</p> <p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation.</p>

Code	Topic 1	Topic 2	Comment	Response
44.5	Alternatives	Peak Period Pricing	Alternatives under discussion such as a comprehensive peak hour pricing analysis...[should use] a range of operations per hour...instead of the single higher operational threshold that underestimated the delay reduction.	The Airside Project analysis of PPP examined an operations threshold of 110 operations per hour, which is already below Logan Airport's normal operating capacity of 120 operations per hour. There is no legitimate operational justification for imposing a peak period surcharge at an operation level significantly lower than Logan Airport's normal operating capacity which is achieved 80 percent of the year without any delays. Even at 75 operations per hour, Logan Airport would be subject to delays from northwest wind conditions. The Airside Project analysis in the Draft EIS/EIR and in the Supplemental DEIS/FEIR indicates that, with the Preferred Alternative, Logan Airport can accommodate existing and foreseeable future levels of demand without imposing a drastic administrative restriction to artificially revise Logan Airport's existing capacity.
44.6	Regional Transportation	Regional Airports	Hanscom should not be ruled out as a piece of the regionalization solution, and a second major airport should have at least been considered.	<p>The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.</p> <p>The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the Hanscom GEIR (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to <i>Section 2.6 of the Supplemental DEIS/FEIR</i> for a discussion of Hanscom Field.</p> <p>The statement referred to FAA reported (Opsnet) delays, which declined from 19,838 in 1993 to 16,403 in 1998. This decline in FAA delays was supported by the Airside Project modeling in the Supplemental DEIS/FEIR which showed a reduction in 1998 delays (120,000 hours) compared to 1993 (185,000 hours). Although total operations were nearly equivalent (519,000 in 1993 and 514,000 in 1998), the fleet mix and demand profile were significantly different. The high delays in 1993 were principally caused by a very peaked schedule with hourly operations exceeding 120 per hour.</p>

Code	Topic 1	Topic 2	Comment	Response
44.7	Noise	Model	...Noise and air quality equipment should be along flight paths, Chelsea's air monitor is at the Soldiers Home — out of harm's way.	The DEP air quality monitoring stations, including the one located in Chelsea, are established to serve multiple functions. In some cases, the purpose is to record background concentrations, sometimes to evaluate neighborhood conditions, and in other situations to measure the impact of specific sources of air emissions. The Chelsea station is a neighborhood station and, therefore, the only relevant data to the airport area are the ozone data. By comparison, the DEP Bremen Street air monitoring station adjoins the airport and is in nearly the direct path of one of Logan Airport's runways. The data from both stations are reported in the EIS/R.
44.8	Ecosystems	Rare Species	The impact on the Upland Sandpiper. The plan to relocate or mitigate for this endangered species in inadequate and indefinite.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.
44.9	Ground Transportation	Access to Logan Airport	...A study of the long-term traffic impacts on the surrounding communities should be as comprehensive as possible.	The Airside Project does not result in additional aircraft operation or passenger demand for ground access services, since the project will not induce additional passenger demand. Refer to the <i>Logan Airport 1994/95 GEIR</i> which includes Massport's Ground Access Management Plan and forecasted Vehicle Miles Traveled for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis.
44.10	Alternatives	Impacts	A benefit cost analysis — how can you realistically and honestly mitigate the noise, health and real estate costs to residents.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives. According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis "for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..."

Code	Topic 1	Topic 2	Comment	Response
44.11	Alternatives	Runway 14/32	The commitment to maintain the new runway's unidirectional status — there isn't one.	<p>The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (<i>i.e.</i>, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only.</p> <p>Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32.</p> <p>The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.</p>
44.12	Analysis Assumptions	Base Year	Data used for this analysis is over 5 years old and doesn't reflect current conditions.	<p>The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.</p>



Chelsea City Council

LETTER 45

City Hall
500 Broadway
Chelsea, MA 02150
(617) 889-8210
(617) 889-8347 Fax

April 18, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As the City Councilor representing the residents of District 5 in Chelsea I thought I would write a comment about Massport's Airside Planning Project. Thank you for considering the opinion of the communities that will be impacted if the new runway is built.

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over heads, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

First and foremost, the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely underestimate it as well. We also feel that soundproofing would do little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park and does not help us as we try to enjoy a sea breeze through open windows in the summertime.

45.1

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants - always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate

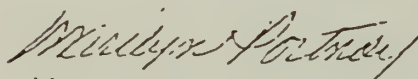
45.2

While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

45.3

Chelsea is undergoing a modern day renaissance. We have had to fight harder than most to turn the City around. As this proposal is being examined we are watching the value of our homes rise. We have a new school system and a local government committed to undoing the past. We were recently honored as an "All America City," in recognition for our ability to address the problems confronting us. Our budget is balanced for the first time, and we are investing millions in our infrastructure in order to move forward into the next century. The proposed expansion of Logan Airport is the single largest threat we face. If this runway is built, years of hard work could be undone in an instant.

Sincerely,



Marilyn Portnoy
Chelsea City Councilor - District 5

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

Letter 45

City of Chelsea, Chelsea City Council

Marilyn Portnoy

Code	Topic 1	Topic 2	Comment	Response
45.1	Noise	Model	<p>...the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely underestimate it as well. We also feel that soundproofing would do little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park and does not help us as we try to enjoy a sea breeze through open windows in the summertime.</p>	<p>Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix F of the <i>Logan Airport 1996 Annual Update</i>).</p> <p>In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model.</p> <p>At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 5 of the <i>Logan Airport 1998 Annual Update</i>). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Using results from a special study of Terrain Modeling analysis ("hill effects") in Orient Heights and Jeffries Point, Massport applied for and received approval to apply a correction to 1999 contours to account for increased levels in Orient Heights.</p> <p>Massport's FAA-approved sound insulation program is only one element of the noise abatement program. For a discussion of the noise abatement program, refer to the discussion in the <i>Logan Airport 1994/1995 GEIR</i> and the <i>Logan Airport 1998 Annual Update</i>. Massport has existing actions initiatives underway that reduce noise impacts on nearby communities, including:</p> <ul style="list-style-type: none"> Noise abatement and runway use restrictions; Exploring means of extending the Logan Airport sound insulation program through innovative investigation of hill effects on sound propagation; Encouraging growth at Worcester Regional Airport and other alternative airports; and Monitoring and improving achievement of PRAS goals.

Code	Topic 1	Topic 2	Comment	Response
45.2	Environmental Justice	Impacts	We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants...We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us.	<p>Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation.</p> <p>The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.</p>
45.3	Ground Transportation	Access to Logan	Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.	<p>The Airside Project does not result in additional aircraft operations because the Preferred Alternative would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. In addition, cargo operations account for only two percent of aircraft activity at Logan Airport since most all cargo aircraft operate during off-peak hours.</p> <p>Despite strong economic growth over the last few years cargo operations increased by less than two percent in 1999 and declined by 1.2 percent in 1998. Some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and our cargo activity at the regional airports.</p>

Rochelle A. Bennett



Councillor, ~~Chelsea~~
City of Chelsea

LETTER 46

April 21, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley, IV, EOE A NO. 10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

Re: EOE A File No. 10458

Dear Sir:

I am writing to express my concerns regarding proposed new Runway 1432 at Logan Airport. I want to preface my letter by saying that I am not opposed to progress, but at what price? Has Massachusetts sunk so low that progress is higher on the list than the health, safety and environmental injustice of its citizens? I would hope not.

Chelsea is approximately 1.8 square miles. Within the boundaries of this small community, you find oil farms, asphalt storage, salt piles, air freight businesses, a fur tanning business, the Boston produce center, the Tobin Bridge, the MWRA headworks and several park and fly facilities. The City is also a cross route to several major MBTA stops. Because of this, Chelsea experiences a very high level of truck (several thousands daily) and auto (approximately 100,000 daily) traffic which I believe has an extremely detrimental environmental impact on the community. In addition, Chelsea is surrounded by Logan Airport, Massport's salt pile in Charlestown and the Edison Plant in Everett. Add these together and you have one extremely high risk area. By allowing Logan Airport to expand, the EPA would be driving another environmental nail into our coffin.

When the Tobin Bridge was built, Chelsea lost 179 taxable properties and went downhill to the point of receivership. Chelsea is now on its way back up. The perception to the outside world is that Chelsea has been turned around and is a desirable place to work and live. Property values have rebounded. New businesses have opened. New schools have been built. While other communities surrounding Chelsea have flourished, it has taken Chelsea more than 50 years to get where it is today. If you allow Runway 1432 to be built, it could put Chelsea back into the rut it just climbed out of but this time Chelsea will never rebound. The new runway will not only cause people



7 Boatswain's Way, Chelsea, Massachusetts 02150

(617) 889-0671

46.1

46.2

Secretary of Environmental Affairs
Page 2
April 21, 1999

to leave the City, it will lower property values and could hamper future non-airport businesses from moving here.

As a recent Cancer patient, I am asking that MEPA not approve Massport's EIR for Runway 1432 until a complete study can be compiled by all of the surrounding cities and towns to determine what adverse health hazards currently exist in each community.

I ask you to keep in mind that your job is to protect us from an unhealthy environment. Therefore, after reading the above and after reading Executive Order No. 385, I hope you will agree with me that more studies need to be done before any decision is made on Runway 1432; and if the above health issues are not enough to sway you, I ask that you find the draft EIS/EIR inadequate because it uses outdated studies, does not adhere to FAA modeling and shows a lack of alternative studies for a regional airport. I also feel that the residents of Chelsea were not given fair consideration in connection with this project.

Sincerely,

Rochelle A. Bennett

Rochelle A. Bennett
Councilor-At-Large

cc: Mr. Robert A. Durand, Secretary
Mr. John C. Silva, Manager FAA
Mr. John DeVillars, EPA

46.3

46.4

46.5

Letter 46

City of Chelsea, Chelsea City Council

Rochelle A. Bennett

Code	Topic 1	Topic 2	Comment	Response
46.1	Ground Transportation	Access to Logan Airport	...Chelsea experiences a very high level of truck (several thousands daily) and auto (approximately 100,000 daily) traffic which I believe has an extremely detrimental environmental impact on the community...By allowing Logan Airport to expand, the EPA would be driving another environmental nail into our coffin.	<p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPR</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).</p> <p>The Airside Project does not result in additional aircraft operations because the Preferred Alternative would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. In addition, cargo operations account for only two percent of aircraft activity at Logan Airport since most all cargo aircraft operate during off-peak hours.</p> <p>Despite strong economic growth over the last few years cargo operations increased by less than two percent in 1999 and declined by 1.2 percent in 1998. Some cargo is now being diverted to regional airports as indicated by the strong growth in cargo services and our cargo activity at the regional airports.</p>
46.2	Alternatives	Runway 14/32	The new runway will not only cause people to leave the City, it will lower property values and could hamper future non-airport businesses from moving here.	Comment noted.
46.3	Public Health	Effects	As a recent Cancer patient, I am asking that MEPA not approve Massport's EIR for Runway 14/32 until a complete study can be compiled by all of the surrounding cities and towns to determine what adverse health hazards currently exist in each community.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
46.4	Delay	Model	...the Draft EIS/EIR ...uses outdated studies, does not adhere to FAA modeling....	<p>The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.</p> <p>This section of the Supplemental DEIS/FEIR also includes a description of computer models for estimating flight delays, including their limitations. FAA reviewed and approved the simulation models used in this study.</p>
46.5	Regional Transportation	Regional Airports	...[the Draft EIS/EIR] shows a lack of alternative studies for a regional airport.	Chapter 2 of both the Airside Project Draft EIS/EIR and this Supplemental DEIS/FEIR thoroughly address the role of the regional airports.



DAVID RAGUCCI
MAYOR

OFFICE OF THE MAYOR
EVERETT CITY HALL
484 BROADWAY
EVERETT, MASSACHUSETTS 02149-3694

LETTER 47

PHONE: (617) 394-2270
FAX: (617) 381-1150

April 12, 1999

Jane F. Garvey, Administrator
Federal Aviation Administration
National Headquarters
800 Independence Avenue
Washington, D.C. 20591

Dear Ms. Garvey:

I am writing to express my opposition to the proposed expansion of Logan International Airport, particularly the planned construction of Runway 14/32. Several reasons are apparent why the Environmental Protection Agency ("EPA") should advise the Federal Aviation Administration against the proposed expansion. Noise pollution, as well as other unfavorable environmental consequences, are among the many reasons to oppose this plan.

As you are aware, Massachusetts Port Authority prepared an Alternative 1A Draft Environmental Impact Statement that details the agency's plan to expand and improve Logan. This alternative plan includes the construction of Runway 14/32, as well as the construction of a new taxiway entitled Centerfield Taxiway. I also ask that you join me in the opposition of the Alternative 1A proposal.

Communities surrounding Logan International Airport have long been affected by unpleasant environmental conditions such as noise pollution, air pollution and ground traffic. One of the many undesirable circumstances has been the increase in noise pollution to neighboring communities such as Revere, Winthrop and East Boston. It has been an ongoing battle of these residents to decrease the high levels of air traffic over their communities. In accepting the proposed Runway 14/32, flight traffic will be shifted over the Greater Boston Area to include communities such as Everett who will bear a greater amount of air traffic.

It is believed that the state and federal government are responsible to create a plan that would divert the excess traffic at Logan to other commercial airports that would welcome passenger service.

47.1

47.2

47.3

John P. DeVillars
April 12, 1999
Page 2

I am in agreement with Mayor Menino that a "Blue Ribbon Panel" should be established to create a regional aviation transportation agency to thoroughly examine the status of our aviation transportation system before we implement any new changes at Logan.

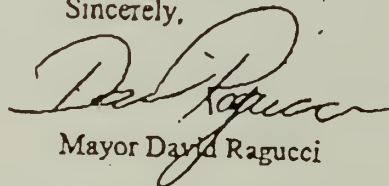
47.4

Communities surrounding Logan International Airport will have serious adversarial affects from the acceptance of the proposed Runway 14/32. Therefore, based on the above information, I can not support the implementation of a new runway or the expansion of Logan Airport.

I appreciate your time regarding this matter. I look forward to receiving the EPA's response to these concerns.

I am available to further discuss this matter at your convenience.

Sincerely,



Mayor David Ragucci

Letter 47

David Ragucci, Mayor Everett, Massachusetts

Code	Topic 1	Topic 2	Comment	Response
47.1	Noise	Impacts	Communities surrounding Logan International Airport have long been affected by unpleasant environmental conditions such as noise pollution, air pollution and ground traffic. One of the many undesirable circumstances has been the increase in noise pollution to neighboring communities such as Revere, Winthrop and East Boston.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the <i>Logan Airport ESPR</i> and its updates.
47.2	Alternatives	Runway 14/32	In accepting the proposed Runway 14/32, flight traffic will be shifted over the Greater Boston Area to include communities such as Everett who will bear a greater amount of air traffic.	In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. In fact, the most heavily impacted communities will experience a decrease in overflights compared to 1998 levels.
47.3	Regional Transportation	Regional Airports	It is believed that the state and federal government are responsible to create a plan that would divert the excess traffic at Logan to other commercial airports that would welcome passenger service.	Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size.

Code	Topic 1	Topic 2	Comment	Response
47.4	Environmental Review Process	Blue Ribbon Panel	I am in agreement with Mayor Menino that a "Blue Ribbon Panel" should be established to create a regional aviation transportation agency to thoroughly examine the status of our aviation transportation system before we implement any new changes at Logan.	<p>In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts.</p> <p>Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies have concluded that The Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high-speed rail are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of regional transportation alternatives to Logan Airport and steps Massport has taken to foster increased use of these alternatives.</p> <p>Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999, attendance at a second summit in December 2000, and its assumption of operating responsibility for the Worcester Regional Airport in January 2000. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of Massport's initiatives in support regional transportation alternatives.</p>

TOWN OF HINGHAM

OFFICE OF SELECTMEN



LETTER 48

Shirine W. Reardon, Chairman
Martin Crane, M.D.
Michael P. Holden

Charles J. Cristello
Town Administrator

April 21, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley- EOE
100 Cambridge Street, 20th Floor
Boston, MA 02205

Dear Mr. Pugsley:

The Hingham Board of Selectmen wishes to submit the following comment on Massport's proposal to construct a new runway at Logan Airport and the SDEIS/SDEIS for the Logan Airside Improvements Planning Project as presented by the Massachusetts Port Authority.

We have reviewed the Citizens Advisory Committee's Consultant Report and it appears that there are several aspects in which the SDEIS/R is deficient. These include the use of out of date base line data, omission of key issues included in the ENF and an overly limited analysis of alternatives.

Hingham is projected to sustain a 152% increase in flights over the town. Many residents are concerned about the incremental effects on personal health and quality of life. In addition we are concerned about increased traffic congestion caused by increasing the capacity of the airport.

The Hingham Board of Selectmen is further concerned that this short term proposal, ostensibly to reduce current delays, will surely only delay by a short time the point at which airport traffic will once again become unmanageable. We urge Massport to withdraw this proposal and to enter into a long term planning effort to meet the needs of the New England region without overburdening the Boston metropolitan area with the impacts of air travel.

Finally, it is our view that, if not withdrawn, this SDEIS/R should be rejected as inadequate.

Sincerely,

Michael P. Holden

cc: Representative William Delahunt
Peter Blute, Executive Director, Massachusetts Port Authority

48.1

48.2

48.3

Letter 48

Town of Hingham, Office of Selectmen

Michael P. Holden

Code	Topic 1	Topic 2	Comment	Response
48.1	Public Health	Effects	Hingham is projected to sustain a 152% increase in flights over the town. Many residents are concerned about the incremental effects on personal health and quality of life.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
48.2	Ground Transportation	Access to Logan	In addition we are concerned about the increased traffic congestion caused by increasing the capacity of the airport.	<p>Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the <i>Logan Airport 1999 ESPR</i> (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).</p> <p>Federal constitutional provisions (preemption, commerce clause, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to limit the number of aircraft operations. Since Aviation Deregulation in 1979, airlines have been free to select their own markets, schedules and equipment without Federal, State or local intervention.</p>

Code	Topic 1	Topic 2	Comment	Response
48.3	Alternatives	Runway 14/32	The Hingham Board of Selectmen is further concerned that this short term proposal...will surely only delay by a short time the point at which airport traffic will once again become unmanageable. We urge Massport to withdraw this proposal and to enter into a long term planning effort to meet the needs of the New England region without over-burdening the Boston metropolitan area with the impacts of air travel.	<p>Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.</p> <p>Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies have concluded that The Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high-speed rail are necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of regional transportation alternatives to Logan Airport and steps Massport has taken to foster increased use of these alternatives.</p> <p>Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999, attendance at a second summit in December 2000, and its assumption of operating responsibility for the Worcester Regional Airport in January 2000. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of Massport's initiatives in support regional transportation alternatives.</p>



Town of Hull



BOARD OF SELECTMEN

April 22, 1999

MUNICIPAL BUILDING
HULL, MASSACHUSETTS 02045
(617) 925-2000

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley - EOE A No. 10458
100 Cambridge Street
20th Floor
Boston, MA 022025

LETTER 49

John C. Silva
Manager, Environmental Programs
Airport Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Project Name:	Logan Airside Improvements Planning Project
Project Location:	Boston-Logan International Airport-Boston / Winthrop
Project Proponents:	Massachusetts Port Authority, Federal Aviation Administration
Project Number:	EOEA No. 10458

Dear Mr. Pugsley and Mr. Silva:

On behalf of the Town of Hull Board of Selectmen I am writing to voice the Town of Hull's opposition to the Draft Environmental Impact Report (EIR)/ Draft Environmental Impact Statement (EIS) filed by Massport and the Federal Aviation Administration. The Town of Hull objects to the construction of a new runway at Logan Airport for the following reasons.

- The base year for the documents calculations and projections is 1993. It is now 1999, using a base year that is six years old is inconsistent with sound planning principals as many of the underlying analysis and modeling require more current data to accurately project future outcomes. For instance, one of the project proponents, the FAA, shows that the percent of operations experiencing delay actually decreased from 1993 to 1998. The projections in the DELAYSIM model developed specifically for this project does not accurately reflect the current state of delay. The failure to use current data causes the model to severely overestimate delay.

49.1

In addition the success of Providence, Manchester and now Pease airports are not reflected in 1993 data. The failure to fully capture the success of these alternatives calls into question the projections that are contained in the report.

49.2

- The document offers a lengthy discussion on delay but fails to fully articulate all the causes for delay. For instance it is impossible from reading the document to determine what percentage of delay is due to mechanical failure. Without a breakdown for the causes of delay the true scope of the Northwest wind caused delay cannot be fully defined. Even the statistics on weather delay do not stratify the delay data by type of weather. 1993 was one of the heaviest snow total winters on record. If there was a day that had a significant snowfall and strong winds how was delay attributed: to the wind direction or the snow fall? The document is silent on this issue.

49.3

The failure to fully define delay not only by type, length and cause but also to deviate from the FAA standard or the Department of Transportation (DOT) standard is cause to reject the report as the nature of the problem that Massport is seeking to solve is not defined in the report.

Further, there is no explanation offered as to why it was necessary to create a new method of calculating delay when there are two federal agencies that have models in place to do so. It should be noted that the FAA and DOT models have a wide divergence and now the Massport model offers a third divergent viewpoint. Which, if any model are we to believe, and why. Additionally by creating a new model the ability to compare projected solutions with solutions that may have been implemented or will be offered at other airports around the country is lost. In essence we are unable to compare apples to apples.

- The report attempts to analyze the cost of delay and puts a \$300 million dollar cost on all delay. By default the cost of delay caused the Northwest wind condition must be somewhat less than \$300 million dollars. However the report does not address the cost that residents of communities that live near the airport will experience in economic or quality of life terms. For instance, the total value of all real estate in Hull per the Massachusetts Department of Revenue is approximately \$700 million dollars. If the proposed runway is constructed thus in part enabling additional 50,000 flights per year over Hull there will be a loss in property values. A conservative estimate of 10 percent would yield a \$70 million dollar loss in value for Hull alone. They're at least seventeen communities that will be severely impacted by this proposal; the loss in real estate value will exceed well over a billion dollars. Additionally, there is a loss in the quality of life that is not fully reflected in the real estate value. The report is completely silent on this issue. The report should be rejected because there is an incomplete analysis of all the cost and benefits associated with the proposal.
- The flight tracks depicted in the EIR/EIS do not conform to actual flight tracks. Massport acknowledges that the actual flight tracks flown may vary significantly from the assigned flight tracks. The data for actual flight tracks flown and the corresponding noise levels were not incorporated into the modeling that produced projections regarding several types of impact, including noise, environmental impacts from fuel and fumes as well as air quality impacts over all affected communities. The report should be rejected because there is an inaccurate analysis of all the impacts of the projected flight paths associated with an additional runway.
- The report should be rejected because the preferred alternative is not the best alternative for reducing delay. Table 4.5-3 clearly illustrates that Alternative 2, an option that does not require building a runway has a greater impact on delay reduction than the preferred Alternative 1A. Alternative 2 puts in place "Peak Hour Pricing" that in essence charges the airlines a premium to land at premium hours. This alternative is far more equitable as the users of the airport would share some of the burden of the airport. Under the Alternative 1A many of the affected population may never use the airport but experience the full burden of the cost. Additionally, Peak Hour Pricing will help to promote Providence, Manchester and Pease Airports as more economical alternatives for some travelers thus further diminishing the adverse impacts of Logan on neighboring communities. Lastly, Peak Hour Pricing has a superior impact on air quality improvement as well as noise abatement. This option if further explored could lead to even greater reduction than outlined in the proposal and at a minimum MEPA should require an analysis with greater depth.
- The proposal projects operations through the year 2010. It indicates that by that time delay will significantly exceed current levels, total operations will have seen a dramatic increase and noise, air quality and impact to surrounding communities will not have improved. In short the building of a new runway dodges the bigger issues. How much is enough? What is the capacity of the airport? What do we do in 2011 when there are no more alternatives at Logan. The proposal is short-term solution to an issue that cries out for a long term solution and perspective. In the mid-nineteen seventies a court injunction was put in place against further expansion at Logan in the 25 years that have followed there have been two half-hearted attempts to seek a long term solution. Massport and all those responsible for seeking and executing long term solutions should not be allowed to continually provide nearsighted solutions without addressing the real issues.

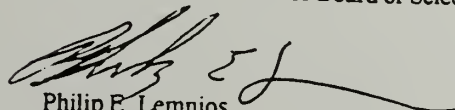
Since the preparation of EIR/EIS several substantial developments have occurred that could dramatically alter the projections used in the report. These developments include:

- Operations at Providence and Manchester have exceeded Massport Projections considerably
- Pease Airport is completing a major expansion and is contracting with two major airlines for service
- Worcester Airport has just come under Massport's control and has upgraded its electronics to improve runway operations under all weather conditions.
- Governor Cellucci has committed to enhancing rail connections from Boston to TF Green Airport.
- New Bedford has offered to expand cargo service to its municipal airport.

49.11

Based on these new developments and the preceding issues we request that EIS/EIR be denied. In the event that denial is not granted then we request that the EIR/EIS be refereed back to Massport. Massport should at a minimum be required to address the inconsistencies and omissions outlined in this letter, the Community Advisory Committee's response and the numerous other letters in opposition. The regulatory agencies that have oversight of this process should demand that an undertaking that would impact the quality of life of over one million, or 1/6th of the Commonwealth's residents be comprehensive and complete. This proposal is neither.

On Behalf of the Town of Board of Selectmen


Philip E. Lemnios
Town Manager

CC:

Governor Cellucci
Senator Edward Kennedy
Senator John F. Kerry
Congressman William Delahunt
Congressman Joseph Moakly
Congressman Michael Cappuano
State Senate President Thomas Birmingham
State Speaker of the House Thomas Finneran
State Senator Robert Hedlund
State Representative Mary Jeanette Murray



Letter 49

Town of Hull

Philip E. Lemnios, Town Manager

Code	Topic 1	Topic 2	Comment	Response
49.1	Analysis Assumptions/ Methodologies	Base Year	The base year for the documents calculations and projections is 1993. It is now 1999, using a base year that is six years old is inconsistent with sound planning principals as many of the underlying analysis and modeling require more current data to accurately project future outcomes... The projections in the DELAYSIM model developed specifically for this project does not accurately reflect the current state of delay. The failure to use current data causes the model to severely overestimate delay.	The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenanos for 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 2010 to 2020 time frame.
49.2	Regional Transportation	Regional Airports	In addition the success of Providence, Manchester and now Pease airports are not reflected in 1993 data. The failure to fully capture the success of these alternatives calls into question the projections that are contained in the report.	Chapter 2 of the Supplemental DEIS/FEIR provides a discussion of the specific role played by the regional transportation alternatives and steps that Massport has taken to foster use of these alternatives. Massport has long recognized and has been a proponent of options to Logan Airport. Together with the regional airports, Massport has implemented a regional strategy to enhance the use of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million annual passengers that could be absorbed by regional alternatives that include use of T.F. Green/Providence, Manchester and Worcester Regional airports, as well as the new high-speed rail to New York. In the Supplemental DEIS/FEIR, Massport recognizes that these developments will slow Logan Airport's passenger traffic growth. Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015, and the 45 million passenger forecasts may not be achieved until after 2020. While regional alternatives can play an important role in reducing the rate of future traffic growth at Logan Airport, they do not address Logan Airport's inability to efficiently accommodate current levels of demand during northwest wind conditions. Runway 14/32, which is designed to correct the problem with Logan Airport's layout, is necessary to correct this deficiency and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
49.3	Delay	Model	The document offers a lengthy discussion on delay but fails to fully articulate all the causes for delay. For instance, it is impossible from reading the document to determine what percentage of delay is due to mechanical failure. Without a breakdown for the causes of delay the true scope of the Northwest wind caused delay cannot be fully defined.	The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.
49.4	Delay	Model	Further, there is no explanation offered as to why it was necessary to create a new method of calculating delay when there are two federal agencies that have models in place to do so. It should be noted that the FAA and U.S. DOT models have a wide divergence and now the Massport model offers a third divergent viewpoint. Which, if any model are we to believe, and why. Additional by creating a new model the ability to compare projected solutions with solutions that may have been implemented or will be offered at other airports around the country is lost. In essence we are unable to compare apples to apples.	Chapter 4 of the Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays used in the Airside Project. Chapter 1 and Appendix C include a description of measures used by FAA and U.S. DOT to calculate delay, the limitations of those measures, an explanation of computer models for estimating flight delays, and historical delay data at Logan Airport and other major United States airports.
49.5	Noise	Impacts	...the report does not address the cost that residents of communities that live near the airport will experience in economic or quality of life terms...there is an incomplete analysis of all the cost and benefits associated with this proposal.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives. According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis "for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..." In fact, the FAA models tend to overstate delays since they use weighted averages rather than continuous weather conditions.
49.6	Noise	Impacts	The flight tracks depicted in the EIR/EIS do not conform to actual flight tracks. Massport acknowledges that the actual flight tracks flow may vary significantly from the assigned flight tracks. The data for actual flight tracks flown and the corresponding noise levels were not incorporated into the modeling that produced projections regarding several types of impact, including noise, environmental impacts from fuel and fumes as well as air quality impacts over all affected communities.	The flight tracks used in the model were derived from radar data depicting actual flight tracks to be representative of the entire set of actual tracks. The tracks that were derived for departure operations off each runway represent the dispersion and turns of the actual tracks. The use of each derived track is weighted to reflect the actual use. It is believed that the number of tracks used in this study and in the Logan Airport 1999 ESPR (previously GEIR) leads to greater accuracy in estimating the noise impacts than is obtained with fewer tracks used in studies at many other airports.
49.7	Alternatives	Preferred Alternative	...the Preferred Alternative is not the best alternative for reducing delay... Alternative 2, an option that does not require building a runway, has a greater impact on delay reduction than the Preferred Alternative 1A. Alternative 2 puts in place "Peak Hour Pricing" that in essence charges the airlines a premium to land at premium hours. This alternative is far more equitable as the users of the airport would share some of the burden of the airport.	The Airside analysis indicates that Peak Period Pricing is an effective option when airline's schedule beyond the normal hourly operating capacity of the airport. Peak Period Pricing is not recommended for implementation at this time, because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport is prepared to initiate a process, as described in Section 4.5.4 of the Supplemental Draft EIS/Final EIR, to initiate the rule-making process to implement Peak Period Pricing at that time.

Journal of Management Inquiry 18(6)

Town of Hull
225 Atlantic Avenue
Hull, Massachusetts 02045

Planning Board
781-925-2117

April 21, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley - EOE No. 10458
100 Cambridge Street 20th floor
Boston, MA 02205

LETTER 50

Re: OPPOSED to Runway 14/32

Dear Mr. Pugsley:

I am writing on behalf of the Town of Hull Planning Board to express our strong opposition to Massport's proposed new runway, 14/32. Our concern is that the new runway will allow more flights into and out of Logan Airport. As elected officials, we believe that Runway 14/32 will substantially increase the air traffic over our community which will result in significant negative impact to our quality of life and the economics of our town.

50.1

The Town of Hull has been undergoing a renaissance over the past several years. We have developed a vision statement for our community that defines our goals and aspirations for Hull. The elected officials and citizens have worked diligently with many Commonwealth of Massachusetts agencies to develop an Economic Master Plan, a Harbor Management Plan, and an Open Space and Recreation Plan. We are one of only a few communities in the state that have an approved Open Space and Recreation Plan and we will soon be one of only a few communities that will have a Harbor Management Plan. We have also seen a significant investment by the MDC in our community to revitalize Nantasket Beach.

As you can see, we have made a significant investment in our community. The result has been a positive impact on Hull's fiscal position and improved socioeconomics of our community. The increase in noise and air pollution as a result of Runway 14/32 will negate many of the benefits we have been able to achieve from our efforts.

Government is by the people and for the people. Government agencies should not be independent from the will of the people. Elected officials and surrounding communities have voiced their opposition to this new runway. Please consider the negative impact that Runway 14/32 will have in terms of quality of life and economics for all of the surrounding communities. Most importantly, please heed the voice of the people. Thank you.

Sincerely,



David P. Carlon
Chairman

Letter 50

Town of Hull, Planning Board

David P. Carlon, Chairman

Code	Topic 1	Topic 2	Comment	Response
50.1	Alternatives	Runway 14/32	...we believe that Runway 14/32 will substantially increase the air traffic over our community which will result in significant negative impact to our quality of life and the economics of our town.	<p>The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals, and Hull is affected by the use of Runway 33/32 arrivals. The total number of aircraft arriving to the northwest does increase with construction of the runway, but this is due to the PRAS goals more than any other factor. Since the Runway 33 arrivals that impact Hull approach primarily over water, and since Hull is further from the airport than those communities impacted by arrivals to Runway 15L/R, 4L/R, or 22L/R, the PRAS goals call for 42 percent of the equivalent arrivals to operate in this direction. Runway 33 arrivals accounted for approximately 27 percent of the equivalent arrivals in 1998, and since Logan Airport has a limited capacity in this direction, the northwest configuration has been underutilized as demand has increased over the years. Construction of the runway allows better achievement of the agreed-upon PRAS goals, but even with Runway 14/32, the equivalent arrivals in the Runway 33/32 direction never reach the goal of 42 percent under any fleet scenario or alternative.</p> <p>Operations in the vicinity of Hull increase with the Preferred Alternative primarily due to aircraft landing to the northwest, either on new Runway 32 or because of greater use of Runway 33L. However, the noise exposure levels resulting from these increased operations remains several decibels below 60 DNL as indicated by the specific point analysis at Site 26 in Tables 6.2-8, 6.2-9, 6.2-22, and Appendix E-1 of the Supplemental DEIS/FEIR. These levels are nearly 20 dB below the highest exposure in Winthrop and 15 dB below the exposure in parts of East Boston and Revere, which the new runway would help to improve.</p>

U

Town and County of Nantucket
Board of Selectmen • County Commissioners

Arthur L. Desrocher, Chairman
Charles "Jack" Gardner
Georgia Ann Snell
Timothy M. Soverino
Vincent M. Vacca



Town & County Building
16 Broad Street
Nantucket, Massachusetts 02554

Telephone (508) 228-7255
Facsimile (508) 228-7272

C. Elizabeth Gibson
Town & County Administrator

April 7, 1999

LETTER 51

Secretary of Environmental Affairs
ATTN: MEPA Office
Mr. Arthur Pugsley-EOEA No. 10458
Cambridge Street
20th Floor
Boston, MA 02202

Mr. John Silva
Manager, Environmental Programs
Airport Division
New England Region
12 New England Executive Park
Burlington, MA 01803

Dear Mr. Pugsley and Mr. Silva:

On behalf of the Town of Nantucket, I write to you today to express the Town of Nantucket's support of Massport's preferred alternative for reducing delays at Logan International Airport and to reaffirm our strong opposition to peak period pricing.

Although efforts to reduce congestion and delay are laudable, the method chosen is poorly conceived and potentially disastrous for the Massachusetts regional airports that depend on efficient economical air service for community success. We can agree on the need for a new runway to ease congestion, but tying it to peak period pricing is not acceptable.

Nantucket, other Cape and Island communities, and smaller cities throughout New England are dependent on Logan as the "hub" of a "hub and spoke" system of airports which acts as a gateway to the rest of the world. To place high fees on the regional airlines upon which we are dependent for tourist and business travel during the hours when most people need to travel, is to deny us a fair chance at economic survival.

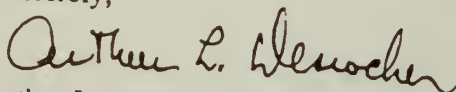
Nantucket enplanes more passengers than any other airport in Massachusetts after Logan. We are the fifth among all cities in New England in that same regard. This proposed fee structure will harm our residents and visitors severely because of the increase in landing fees for the smaller

51.1

aircraft which serve us and other Cape and Island communities. Those fees must be passed on to the traveler. The effect will be to send the discretionary traveler elsewhere, and for off-season service to be eliminated or curtailed.

Nantucket is working along with the other commercial service airports of Massachusetts to convince MASSPORT to eliminate peak period pricing as an option. The five airports of the Cape and Islands contribute 100% of the intrastate commercial airline passengers who will be affected adversely by this proposition. The actions by MASSPORT to curtail travel in a time of economic recovery for the State is unconscionable.

Sincerely,



Arthur L. Desrocher, Chairman
Nantucket Board of Selectmen

pc: Senator Edward M. Kennedy
Senator John F. Kerry
State Senator Henri Rauschenbach
State Representative Eric T. Turkington
Nantucket Airport Commission

Letter 51

Town and County of Nantucket

Board of Selectman

Arthur L. Desrocher, Chairman

Code	Topic 1	Topic 2	Comment	Response
51.1	Alternatives	Peak Period Pricing	<p>On behalf of the Town of Nantucket, I write to you today to express the Town of Nantucket's support of Massport's Preferred Alternative for reducing delays at Logan International Airport and to reaffirm our strong opposition to peak period pricing...To place high fees on the regional airlines upon which we are dependent for tourist and business travel during the hours when most people need to travel, is to deny us a fair chance at economic survival... This proposed fee structure will harm our residents and visitors severely because of the increase in landing fees for the smaller aircraft which serve us and other Cape and Island communities. Those fees must be passed on to the traveler. The effect will be to send the discretionary traveler elsewhere, and for off-season service to be eliminated or curtailed.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p> <p>Massport considers Logan Airport to be part of a regional system of airports that includes T.F. Green/Providence, Manchester and Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate growth in air travel demand. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a discussion of the roles of Logan Airport and these regional airports in the eastern New England aviation system.</p>



TOWN OF ORLEANS

19 SCHOOL ROAD

ORLEANS

MASSACHUSETTS 02653-3699

Telephone (508) 240-3700 — Fax (508) 240-3703

<http://www.town.orleans.ma.us>

BOARD OF
SELECTMEN

TOWN
ADMINISTRATOR

May 7, 1999

LETTER 52

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attn: Arthur Pugsley, MEPA Unit

John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, MA 01803

EOEA #10458

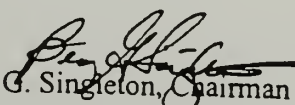
Dear Sirs:

On behalf of the Town of Orleans, the Board of Selectmen would like to comment on the Draft Environmental Impact Report (EIS/EIR) for the Logan Airside Improvements Planning Project. We concur with the findings and conclusions in the report that Peak Period Pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport and therefore should be eliminated from further consideration.

The economic and environmental well being of Cape Cod's residents and businesses depends on continued safe and efficient air transportation access to Logan. Peak Period Pricing, if implemented, would create a severe hardship on airlines such as Cape Air that use small aircraft and would increase automobile travel between Cape Cod and Boston, adding to the congestion at the Bourne and Sagamore Bridges, on Route 3 and Route 6. In addition, for the communities of the Outer Cape, the potential loss of air carrier service by Cape Air as a result of Peak Period Pricing would threaten the health and safety of residents by eliminating medical care flight service that many rely on, forcing ambulances to drive up to an hour away to Cape Cod Hospital and two and one half hours to Boston.

Thank you for the opportunity to comment on this report.

Very truly yours,


Beverly G. Singleton, Chairman
Orleans Board of Selectmen

52.1

Letter 52

Town of Orleans

Beverly G. Singleton, Chairman

Code	Topic 1	Topic 2	Comment	Response
52.1	Alternatives	Peak Period Pricing	<p>We concur with the findings and conclusions in the report that Peak Period Pricing is not an appropriate strategy for reducing aircraft delay at Logan Airport and therefore should be eliminated from further consideration. The economic and environmental well being of Cape Cod's residents and businesses depends on continued safe and efficient air transportation access to Logan. Peak Period Pricing, if implemented, would create a severe hardship on airlines such as Cape Air that use small aircraft...[F]or the communities of the Outer Cape, the potential loss of air carrier service by Cape Air as a result of Peak Period Pricing would threaten the health and safety of residents by eliminating medical care flight service that many rely on, forcing ambulances to drive up to an hour away to Cape Cod Hospital and two and one half hours to Boston.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p> <p>A conceptual exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5 of the Supplemental DEIS/FEIR.</p>

Town of Provincetown



Town Hall, 260 Commercial Street
Provincetown, Massachusetts 02657
Facsimile (508) 487-9560
Telephone (508) 487-7000

BY FACSIMILE AND CERTIFIED MAIL

LETTER 53

April 21, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street, 20th floor
Boston, MA 02202
ATTN: Arthur Pugsley, MEPA Unit
EOEA #10458

Mr. John C. Silva, Manager
Environmental Programs
Airports Division, ANE-600
New England Region
12 New England Executive park
Burlington, MA 01803

SUBJ: Logan Airside Improvements Planning Project: *Provincetown Supports Runway 14/32 in Alternative 1A, But Opposes Peak Period Pricing at Logan Airport*

Dear Sirs:

The Town of Provincetown and its Board of Selectmen wish strongly to support the proposal for construction of a new unidirectional runway 14/32 at Logan Airport, contained in Alternative 1A of the Draft Environmental Impact Report/Impact Statement for the Logan Airside Improvements Planning Project. We wish to be on record in support of the preferred alternative which the DEIR/IS finds as the single most effective action in addressing weather-related delays at Logan.


With that said, however, Provincetown wishes strongly to oppose any inclusion of peak period pricing in Alternative 1A or otherwise. As we have long said, peak period pricing could seriously—perhaps fatally—undermine the economic viability of Provincetown Municipal Airport. The Cape Cod Commission's Transportation Committee has cited prior Massport consultant findings of the "real possibility" that peak-period pricing could put Cape Air out of business. From Provincetown's unique perspective—since Cape Air operates our municipal airport under the auspices of our Airport Commission—putting Cape Air out of business has the "real possibility" of putting Provincetown Municipal Airport out of business. For Provincetown—where the closest ambulance drive is an hour away to Cape Cod Hospital and two-and-a-half hours away to Boston—the loss of our airport would fundamentally threaten the health and safety of our residents. We cannot allow that to happen.

53.1

Page 2

Thank you for your consideration.

Sincerely,



Keith A. Bergman
Town Manager

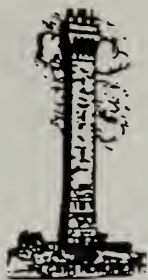
Cc: Board of Selectmen
Provincetown Airport Commission
Cape Air c/o Mr. Dan Wolf
State Senator Henri Rauschenbach
State Representative Shirley Gomes
Governor A. Paul Cellucci
Congressman William Delahunt
Senator Edward M. Kennedy
Senator John Kerry

Letter 53

Town of Provincetown

Keith A. Bergman, Town Manager

Code	Topic 1	Topic 2	Comment	Response
53.1	Alternatives	Peak Period Pricing	...Provincetown wishes strongly to oppose any inclusion of peak period pricing in Alternative 1A or otherwise. As we have long said, peak period pricing could seriously—perhaps fatally—undermine the economic viability of Provincetown Municipal Airport...the loss of our airport would fundamentally threaten the health and safety of our residents.	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p> <p>A conceptual exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5 of the Supplemental DEIS/FEIR.</p>



AIRPORT COMMISSION

Town of Provincetown

The First Landing Place of the Pilgrims



MASSACHUSETTS

PROVINCETOWN MUNICIPAL AIRPORT
Race Point Road, P.O. Box 657
Provincetown, MA 02657

LETTER 54

April 21, 1999

Secretary Robert Durand
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, Ma. 02202
ATTN: Arthur Pugsley, MEPA Unit
EOEA #10458

Mr John Silva, Manager
Environmental Programs
FAA Airports Division, ANE-600
New England Region
12 New England Executive Park
Burlington, Ma. 01803

Re; Logan Airport Airside Improvements

Dear Sirs:

The Provincetown Airport Commission is putting our full support behind the proposed construction of the unidirectional runway 14/32 at Logan International Airport. This item is found in the Draft Environmental Impact Report / Impact Statement for Logan Airport Airside Improvements Planning Project (Alternative 1A). We are convinced that the unidirectional runway is the most effective way to address traffic delays at Logan. This is especially important during weather delays.

The Provincetown Airport Commission also wants to be put on record that we strongly oppose any inclusion of Peak Period Pricing in Alternative 1A of the Logan DEIR/IS and any other Peak Period Pricing information or planning in the future. We believe Peak Period Pricing would devastate the Provincetown Municipal Airport and very possibly drive our only commuter air carrier (Cape Air) out of the Provincetown market or even out of business. We all know how fragile the economic viability of Lower Cape Cod is and when you add the health and safety of our residents and tourists we cannot allow this to happen.

54.1



Town of Provincetown

The First Landing Place of the Pilgrims



MASSACHUSETTS

AIRPORT COMMISSION

PROVINCETOWN MUNICIPAL AIRPORT
Race Point Road, P.O. Box 657
Provincetown, MA 02657

Sincerely

Leonard Alberts
Provincetown Municipal Airport
Commission Chairman

Cc. Provincetown Board of Selectmen
Provincetown Town Manager, Keith Bergman
Cape Air c/o Mr Dan Wolf
State Senator Henri Rauchenbach
State Representative Shirley Gomes
Governor A. Paul Cellucci
Congressman William Delahunt
Senator Edward Kennedy
Senator John Kerry

Letter 54

Town of Provincetown, Municipal Airport Commission Leonard Alberts, Chairman

Code	Topic 1	Topic 2	Comment	Response
54.1	Alternatives	Peak Period Pricing	<p>The Provincetown Airport Commission is putting our full support behind the proposed construction of the unidirectional Runway 14/32 at Logan International Airport...The Provincetown Airport Commission also wants to be put on record that we strongly oppose any inclusion of Peak Period Pricing in Alternative 1A of the Logan DEIR/IS and any other Peak Period Pricing information or planning in the future. We believe Peak Period Pricing would devastate the Provincetown Municipal Airport and very possibly drive our only commuter air carrier (Cape Air) out of the Provincetown market or even out of business.</p>	<p>Section 4.5 of the Supplemental DEIS/FEIR provides an analysis of a PPP Exemption Program designed to protect services to small communities that are most reliant on Boston (Logan Airport) for access to the national air transport system. The analysis examines the impact that an exemption program would have on the delay reduction benefits associated with PPP. It concludes that an essential level of air service in the peak period can be exempted from the peak period surcharge without a material impact on the delay reduction benefits. This exemption program includes all the Cape Cod communities currently served by Logan Airport, as well as other small communities in New England.</p> <p>A conceptual exemption program designed to protect services to small communities most reliant on Boston for access to the national air transport system is described in Section 4.5 of the Supplemental DEIS/FEIR.</p>





